

Religion, Culture and the Politicization of Honour-Related Violence

*A Critical Analysis of Media and Policy Debates
in Western Europe and North America*

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Acronyms

CDA	Christen Democratisch Appèl (Christian Democratic Appeal)
CDU	Christlich Demokratische Union (Christian Democratic Party)
CSU	Christlich Soziale Union (Christian Social Party)
FDP/DVP	Freie Demokratische Partei/Deutsche Volkspartei (Liberal Party in Baden Württemberg)
FMU	Forced Marriage Unit (Metropolitan Police Service)
HAC	Home Affairs Committee
IOT	Inspraak Orgaan Turken in Nederland (Umbrella organization for Turks in the Netherlands)
LEC	Landelijk Expertisecentrum Eergerelateerd Geweld (National Expertise Centre for Honour-Related Violence)
MEP	Unit for Multi-Ethnic Policing
NGO	non-governmental organization
PvdA	Partij van de Arbeid (Labour Party)
PVV	Partij voor de Vrijheid (Party for Freedom)
SALCO	South Asian Legal Clinic of Ontario
SBS	Southall Black Sisters
SD	Süddeutsche Zeitung
SMN	Samenwerkingsverband Marokaanse Nederlanders (Joint Organization of Moroccan Dutch)
SPD	Sozialdemokratische Partei Deutschland (Social Democratic Party)
TAZ	Die Tageszeitung
TBB	Türkischer Bund Berlin Brandenburg (Turkish Federation Berlin Brandenburg)
UNRISD	United Nations Research Institute for Social Development
VON	Vluchtelingen-Organisaties Nederland (Refugees Organizations in the Netherlands)
VVD	Volkspartij voor Vrijheid en Democratie (People's Party for Freedom and Democracy)

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Summary

Over the past decade, the issue of honour-related violence (including honour killing and forced marriage) has entered media and policy debates in immigrant-receiving countries like the Netherlands, Germany, Britain and Canada. In some of these countries, media debate has instigated policy debate. For example, in Germany, the brutal 2005 murder of 23-year-old Hatun Aynur Sürücü by her brother sparked a political debate on family violence within Muslim immigrant communities, focusing not only on honour killing but also on forced marriage. In both the Netherlands and Britain, incidences of honour-related violence led to (immigrant) women's NGO advocacy for prevention, protection as well as prosecution. Politicians' receptiveness to these efforts was in part facilitated by media discussions of murders and other incidents, such as the murders in the Netherlands of Kezban Vural by her husband in 1999, high-school student Zarife by her father in 2003 and Mrs. Gül by her ex-husband in 2004; and the murders in Britain of Rukhsana Naz by her mother and brother in 1998, 16-year-old Heshu Yones by her father in 2002 and 20-year-old Banaz Mahmod by her father and uncle in 2007. In Canada, by contrast, discussions of the murders of 17-year-old Amandeep Atwal in 2003 and 16-year-old Aqsa Parvez in 2007, both by their fathers, did not instigate policy debate.

This paper analyses how media, parliaments and other state institutions, and non-governmental organizations (NGOs) conceptualize honour killing and honour-related violence in order to uncover how such conceptualizations inform policy responses. The analysis reveals three main trends:

- i. discussions that link honour killing to Islam and/or the backwardness of immigrant communities in ways that lead to the *stigmatization* of entire immigrant communities;
- ii. *culture-blind* portrayals of honour-related violence as domestic violence or violence against women that do not pay attention to cultural specificities; and
- iii. debates that are *contextually specific*, framing honour-related violence as a contextually informed form of violence against women that occurs within particular immigrant communities but where this violence does not essentialize the culture and practices of those communities as a whole.

The paper shows that these discursive conceptualizations inform different policy approaches to the issue. Korteweg and Yurdakul contend that discussions of honour-related violence that stigmatize are more likely to lead to general anti-immigrant policies or policies that impede settlement. Debates that frame honour-related violence as a variant of the generally widespread problem of domestic violence and violence against women are more likely to lead to policies that directly target these forms of violence.

The country-specific findings show that the stigmatization of Muslim communities is present in media and political debates in each country, albeit in varying degrees. In the Netherlands, the authors found contextually specific policy-making, which was embedded in the country's multiculturalist tradition. Although there is a recent debate on the decline of multiculturalism in the Netherlands, institutional structures still permit immigrant-oriented and inclusive political decision-making processes. The policies against gendered violence in the Netherlands are largely contextually specific, integrating different actors (such as NGOs, shelters and police) and aiming for prevention and protection as well as prosecution. By contrast, the German media and political debates are particularly stigmatizing without informing or offering alternative ways of policy-making. This has led to policies that generally restrict immigration rather than those that directly target gendered violence in immigrant communities. In Britain, perhaps the most paradoxical case of all four countries, stigmatization and contextually specific approaches were both present. The recent shift from British multiculturalism to social cohesion policies brings a new approach to dealing with immigrant-related issues in the country in general, and policy approaches to gendered violence in immigrant communities has partially

reflected this shift in immigrant integration policies. Culture-blind portrayals of honour-related violence are especially prevalent in Canadian media and political debates. In Canada, violence against women in immigrant communities is discussed only within the domestic violence framework, ignoring the immigration context that may affect this kind of violence. Therefore, no policies in Canada specifically acknowledge, define or target honour-related violence.

The authors suggest that policy responses will be effective only insofar as gendered violence is understood within its social, cultural and political context *and* if that context is not seen as foreign but rather as part of the new social relations in the immigrant-receiving society. Hence, they argue that honour-related violence needs to be understood not as a “cultural” or “religious” problem that afflicts particular immigrant communities (in this case, often those perceived and represented as Muslim) but as a specific manifestation of the larger problem of violence against women (which concerns all communities, whether immigrant or not) that in the case of immigrant communities is shaped and informed by the immigration experience. Only a contextually specific approach allows for this understanding.

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Introduction

With the settlement of large groups of immigrants¹ in Western Europe and North-America, “honour killing” and “honour-related violence” are increasingly framed as social problems for immigrant receiving states. This paper analyses how media, parliaments and non-governmental organizations (NGOs) conceptualize honour killing and honour-related violence in four states with relatively large immigrant streams from predominantly Muslim countries: the Netherlands, Germany, Britain and Canada. The analysis of how media, formal political, and NGO domains understand the problem of this particular form of violence against women (and men²) reveals three main trends in these conceptualizations:

- i. discussions that link honour killing to Islam and/or the backwardness of immigrant communities in ways that lead to the stigmatization of entire immigrant communities;
- ii. culture-blind portrayals of honour-related violence as domestic violence or violence against women that do not pay attention to cultural specificities; and
- iii. debates that are contextually specific, framing honour-related violence as a contextually informed form of violence against women that occurs within particular immigrant communities but where discussions of this violence does not essentialize the culture and practices of those communities as a whole.

We show that these discursive conceptualizations inform different policy approaches to the issue (see also Schram 1995). We contend that discussions of honour-related violence that stigmatize are more likely to lead to general anti-immigrant policies or policies that impede settlement. Debates that frame honour-related violence as a variant of the generally widespread problem of domestic violence and violence against women are more likely to lead to policies that directly target this form of violence. However, we suggest that policy responses will be effective only in so far as gendered violence is understood within its social, cultural and political context *and* if that context is not seen as foreign but rather as part of the new social relations in the immigrant-receiving society. Hence, we argue that honour-related violence need to be understood not as a “cultural” or “religious” problem that afflicts particular immigrant communities (in this case, often those who are perceived and represented as Muslim), but as a specific manifestation of the larger problem of violence against women (which concerns all communities, whether immigrant or not) that in the case of immigrant communities is shaped and informed by the immigration experience. Only the contextually specific approach allows for this understanding.

The paper first presents an analysis of scholarly work on honour killing and honour-related violence in the immigration context and situates our analysis of stigmatizing, culture-blind, and contextually specific approaches within the literature on intersectionality and multiculturalism. The next section outlines the data sources and methods of analysis. The section on findings discusses the four country cases in turn, outlines the trajectory of policy development that unfolded in each country roughly between 2004 and 2008. These policy discussions took place in different primary domains in each country: parliament in the Netherlands; media and parliament in Germany and Britain; and media in Canada. In each country, NGOs contributed to debates as well, at times critically. Other state actors, such as the police and those from the Executive side of government also play varying roles. We analyse the discussions in these different domains to see which of the approaches to the problem of honour-related violence

¹ Unless otherwise specified, the term “immigrant” refers to persons with some kind of an immigrant background (for example, first, second, and third generation). Depending on the country, many immigrants are naturalized and have received citizenship or are long-term residents in the receiving country, though others have a more tentative legal status. Although we choose to use such a broad definition, we acknowledge that this term is defined differently in each country according to the specific citizenship acts and immigrant integration policies. Furthermore, these definitions also change over time due to political and historical developments within each country.

² Although we focus mostly on honour-based violence and women in this paper, we acknowledge that men are also subjected to honour-based violence. Research on the different dynamics of how men are subjected to this kind of violence is limited, and should be studied further (but see Ewing 2008; Toprak 2007).

were most prominent: stigmatizing, culture blind, or contextually specific. Although our data do not allow us to systematically disentangle which actors are most influential in shaping the policy response of each state, we indicate when our findings suggest certain patterns.

A cross-country comparative approach, rather than single country case studies, can most effectively show how the variations in debates and the proposed solutions are embedded in the specific political climate and the interaction between political and civil engagements of a given country. Each of the four countries focused on has seen public debate on honour-related violence in the past decade. At the same time, the cases vary in the composition of immigrant communities, dominant understandings of integration trajectories, and ideas about how governments should address social problems. The comparison helps demonstrate that the Dutch case showed most evidence of contextual sensitivity, while stigmatization dominated in the German case. In Britain, stigmatization coincided with contextually specific approaches. In Canada, culture blindness seemed to inform the absence of policy against honour-related violence. The conclusion argues that the more stigmatization dominates, the more difficult it will be to address the actual problems associated with honour-related violence as a specific form of gendered violence and violence against women.

Before moving to the conceptual section, we would like to make a clarification with respect to the scope of the paper and the predicaments of our comparative analytical model. We acknowledge that there are historical and socio-cultural processes that affect the construction of honour-related violence in the recent past of each country. Various historical changes that affect immigration processes, the nature of immigration flows, the reactions of diverse immigrant groups to the immigration processes and the specificities of the sending countries are all parts of the puzzle. Furthermore, the response to honour-related violence in each receiving country is shaped by specific political-historical forces. However, in the scope of this paper, it was not possible to fully delve into the historical and socio-cultural forces that affected the perception of honour-related violence in the receiving and sending countries. The analysis, with its emphasis on contextual specificity, strongly encourages future work to engage more deeply with these complex contexts.

Conceptualizing Honour Killing in the Migration Context

In the literature, honour killing is most often defined as a response to the belief that a woman or girl has violated her family's honour, usually because of perceptions of sexual impropriety.³ Families position men to guard their family honour and one of the marks of honour killing is that they are planned by family councils rather than individual family members. According to this literature, honour killing is common in the Middle East, North Africa and parts of Asia, as well as South America.⁴ In addition, this is a gendered form of violence to which both women and men can fall victim (Blefsky 2009), and of which both men and women can be perpetrators. Honour-related violence is a newer concept, used to capture forms of violence other than murder that are motivated by perceived honour violations. Forced marriages, or marriages that happen under duress, without the consent of one or both partners, have become discursively linked to honour killing and honour-related violence in public debate, though the empirical relationship between them is complex. Forced marriage is seen as involving various forms of explicit violence, such as rape and kidnapping, and/or more subtle ways of coercion, such as extreme family pressure that prevents people from making informed decisions. In addition, women's—and in some cases men's—resistance to forced marriage puts the family's honour in

³ Sev'er and Yurdakul 2001; Van Eck 2003; Mojab 2004. This definition of honour is based on the Turkish cultural understanding of honour; however, honour may have different meanings in, for example, a Moroccan context.

⁴ Deniz Kandiyoti and J.C. Caldwell discuss Middle East, North Africa and South Asia as the "patriarchal belt" in their classic works on the extremities of patriarchal power (Kandiyoti 1988; see also Caldwell 1978). The majority of Muslim groups do not practice honour-related violence in these regions; however, this practice is still present in both Muslim and non-Muslim communities in these regions, as well as in other parts of the world, such as in Latin America and Southern Europe. The United Nations Population Fund (UNFPA) estimates about 5,000 honour killing cases worldwide per year (Sev'er and Yurdakul 2001; UNFPA 2007).

question. Conversely, in South Asian communities in Britain and Turkish/Kurdish communities in Germany, forced marriage is sometimes considered as a “solution” by the families; when a woman or a man chooses a partner who is regarded as inappropriate by their own families, she or he may be forced to marry an “appropriate” partner that is selected by the family members.

Only fairly recently have the terms honour killing and/or honour-related violence become used more frequently in the countries under study. In each country, their usage has been propagated by the media on the one hand, and the political debate on the other. The term honour-related violence is most often used in the Dutch debates; the British media and policy reports use the term “so-called ‘honour’ based violence” in order to reject the idea that murder or violence could legitimately be called honourable. Both in Germany and Canada, the term honour killing is used but not honour-related violence. In addition, in two of the countries under study (Germany and Britain) forced marriage is constructed as a form of violence informed by honour. Whether countries try to tackle these issues simultaneously in policy making seems to depend on the construction of these practices at the discursive level and on policy makers’ perceptions of the needs of immigrant communities.

As far as we can tell, the immigrant communities under discussion vary in the degree to which they see the construction of honour-related or honour-based violence as problematic. Depending on the political stand of the immigrant organization, the reactions from the immigrant side are quite diverse. Some immigrant organizations perceive honour-related violence as a construction of a conservative political party and Right-wing political figures and inadequate or misled immigrant integration policies (such as in the case of the *Islamische Gemeinschaft Milli Görüs* in Germany⁵). Some immigrant organizations use this construction of honour-related violence to address violence against women in immigrant communities more broadly, at times working closely with government to do so (such as the Dutch *Inspraakorgaan Turken* in Nederland/Turkish Community Advisory Board, or IOT). Individual immigrants weigh in on these debates as politicians, journalists, policy makers and professionals in the legal and criminal justice system.

Despite the varying degrees of resonance, we use the term “honour” throughout this paper since all communities, including immigrant ones, have specific understandings of honour; the term honour-related violence captures how such understandings of honour can inform gendered forms of violence. While some scholars and representatives of immigrant communities argue that the use of the term is stigmatizing in and of itself,⁶ we take the standpoint that using the term critically is useful in analysing media and policy debates because it lets us disentangle the ways in which policy is formed. Finally, the violence under discussion is real, regardless of its label, and does need to be addressed.

In many studies, there is a presumed link between Islam (the dominant religion in geographic locations where honour-related violence is reportedly common) and this form of violence against women. However, this is disputed by scholars who argue that honour killing is an outcome of historically rooted forms of patriarchy that are distinct from the religious tenets and prescriptions of Islam.⁷ Indeed, cases in Latin America, Southern Europe and Northern India – in particular, Punjab and Haryana, as well as Uttar Pradesh – show that honour-related violence occurs in regions where Catholicism or Hinduism/Sikhism are the main religions. In addition, in the Middle East, honour killing occurs among Christian families as well as Muslim ones.

⁵ For the views of *Islamische Gemeinschaft Milli Görüs* and related organizations see Sabine Schäfer's interview with Mustafa Yoldas, *Hamburger Morgenpost*, 28 May 2005. http://archiv.mopo.de/archiv/2008/20080528/hamburg/panorama/hamburgs_muslimen_sprecher_mustafa_yoldas.html, accessed on 21 January 2010.

⁶ Chakravarti cited in Welchman and Hossain 2005; Sen 2005; Gill 2008; Razack 2009.

⁷ Pitt-Rivers 1974; Mojab 2004; Kvinnoforum 2005:16.

In our conceptualization of honour killing and honour-related violence we build on arguments that contemporary economic and social forces, including the migration experience, shape the guarding of women's honour.⁸ We take the standpoint that, immigrant communities generally build on homeland practices but redefine them in the new country (Yurdakul and Yukleyen 2009). From this perspective, violence against women in immigrant communities needs to be understood in relation to the history of immigration to the new country and the ethnic and religious background of each specific immigrant community, as well as in relation to the immigrant-receiving country's integration policies, understandings of gendered violence and responses to domestic violence. This paper cannot fully flesh out the way in which debates regarding honour killing and honour-related violence are informed by the specificities of these social and political processes but it pays attention to these dynamics.

Debating Honour Killing and Honour-Related Violence: Stigmatization, Culture Blindness or Contextual Specificity?

In immigrant-receiving countries, honour killing and honour-related violence are discussed in the context of a larger debate on perceived gender inequalities in immigrant communities. These public debates focus on culture, veering between cultural stigmatization and culture blindness. The stigmatizing approach frames immigrant culture as historically unchanging and fully deterministic of immigrants' practices (rather than as a fluid resource of meaning making) (Stolcke 1995; Ghorashi 2003). In these public debates, Western culture, by contrast, is represented as if it holds, if not the reality, then at least the promise of equality and fairness. When it comes to Muslim immigrants, culture is seen as deriving from religion. This reasoning leads to the conclusion that Muslim immigrants in Western countries need to give up their religious and/or cultural practices and adopt Western ones to solve their (gender-related) problems. Although such discussions of honour killing foreground the problem of violence against women, they often lead to the stigmatization of entire immigrant communities by labelling them complicit in criminal practices that are rooted in unequal gender relations.⁹

In a direct inversion of stigmatization, a culture-blind approach posits patriarchy as a universal force that transcends cultural specificity, structuring the lives of women regardless of their origins. From this perspective, honour killing is a form of violence against women within a universal patriarchal context. This approach attempts to eradicate the cultural stigmatization of (Muslim) immigrant communities but at the price of marginalizing the complexities that structure women's (and men's) identities and practices. Ample literature has shown that people's identities and practices are constituted in the intersections of race, gender, religion, national origin, ethnicity, class, sexuality and other social divisions, but culturally blind approaches ignore all but the gender dimension.¹⁰

A contextually specific approach without stigmatization can disrupt this binary interpretation of honour killing and honour-related violence as either cultural or patriarchal. Building on intersectional theory, we argue that honour-related violence is a form of violence against women that is shaped within the intersections of the race, gender, sexual orientation, religious, ethnic and class dynamics of the immigrant-receiving country, and the specific positioning of immigrant communities within this context.¹¹ Successful analyses and interventions in this arena cannot start from the premise that Muslim and other immigrant cultures are "backward" or that Muslim/immigrant women need to be saved from Muslim/immigrant men.¹² Therefore, the analysis will take as its point of departure that honour killing, honour-related

⁸ Maris and Saharso 2001; Abu-Lughod 2002; Kogacioglu 2004; Warrick 2005; Gill 2006.

⁹ Fekete 2006; Phillips 2007; Dustin and Phillips 2008; Ewing 2008; Reddy 2008; Wikan 2008.

¹⁰ Crenshaw 1991; Yuval-Davis 1997; Glenn 1999; McCall 2005.

¹¹ Crenshaw 1991; Glenn 1999; Yuval-Davis 2006.

¹² See also Abu-Lughod 2002; Fekete 2006; Roggeband and Verloo 2007; Yurdakul 2010.

violence and forced marriage are forms of domestic and gendered violence that are influenced by immigrant tradition as well as by the immigration and settlement experience and the immigrant-receiving society's practices.¹³

These contextual factors have two dimensions. First, they include the general issue of violence against women; such violence is a major issue in Western nation-states and is not simply introduced by the influx of immigrants. Furthermore, domestic violence and violence against women have not always been considered public policy issues in the West. Only in the 1960s and 1970s, with the second wave feminist movement, did the four countries under study develop significant policies against violence against women, and support for these policies vary between countries and over time within each country (based on the composition of government and larger socioeconomic contexts).

Second, each country has seen different immigrant integration policy trajectories in struggles over the relative importance of liberal democratic values, multiculturalism, and assertions of ethno-national identity in integration policy development and policies focused on honour-related violence.¹⁴ These struggles define the heterogeneous conditions for participation and belonging that are specific to the historical development of immigration, immigration-related policies in each country, and country-specific sociocultural contexts that themselves vary over time. In brief, the Netherlands has seen a radical shift from Dutch multiculturalism towards approaches to immigrants that have clear assimilatory overtones in which immigrants are increasingly asked to become culturally "Dutch".¹⁵ Germany accepted that it was an immigration country in the late 1990s, but continues to struggle with strong assimilationist demands from powerful political actors.¹⁶ Britain's fabled multiculturalism is being displaced by an emphasis on social cohesion and shared values, with the need for this shift seemingly confirmed by the terrorist attacks of 7 July 2007 (Dustin and Phillips 2008). Finally, Canada continues to adhere to multiculturalism although the latest citizenship policies evince the influence of a European-style assimilation (Triadafilopoulos and Marwah 2009). In sum, these trajectories have affected whether violence against women in immigrant communities, including honour-related violence, is seen as evidence of a need for assimilation into different values and practices or whether there is space for a contextually specific approach to it.

Data and methods

To understand the development of policies to combat honour killing and honour-related violence, this paper focuses on conceptualizations of honour killing and honour-related violence and analyses the policy responses. It builds on work that argues that policies depend on the framing of the problems to be addressed (Schram 1995). Many actors from a variety of political domains can take part in framing problems and making policy—for this paper, we identified actors from the media, parliament and NGOs, as well as the police, as the most influential. We gathered transcripts of parliamentary debates, newspaper articles, statements by various NGOs and police guidelines and research reports. We also conducted interviews with key informants. We carried out a qualitative analysis of the documents and interview transcripts, focusing on the discursive construction of honour-related violence as a particular social problem. We then gauged what kind of policy responses these constructions facilitated (see appendix 2 for specific sources).

The literature suggests that addressing gendered violence within immigrant communities is made more difficult when immigrants are racialized through markers of difference such as gender, religion and culture.¹⁷ Therefore, we pay particular attention to the uses of gender,

¹³ Note that this is not the only form of domestic violence to which immigrant women and men are subjected.

¹⁴ Korteweg and Triadafilopoulos 2009; Korteweg and Yurdakul 2009; see also appendix A for further information on each country.

¹⁵ Korteweg 2006a; Bjornson 2007; Duyvendak et al. 2008.

¹⁶ Triadafilopoulos and Schönwalder 2006; Mandel 2008; Yurdakul 2009.

¹⁷ Fekete 2006; Meeto and Mirza 2007; Dustin and Phillips 2008; Korteweg and Yurdakul 2009.

culture, and religion while analysing how honour-related violence is conceptualized in each of the three domains.

First, we gathered data on the current state of policy that addresses honour-related violence in each country, including forced marriage if this was a strong focus of policy debate. We analysed parliamentary discussions that informed current policies against honour-related violence, as well as police guidelines and research reports. When possible, we supplemented this data with data from interviews with senior level government bureaucrats, allowing us to clarify how gender, religion and culture were negotiated in the policy-making process. For the Netherlands, we looked at records of parliamentary debates by the standing committee on immigrant integration that took place between late 2004 and the end of 2008. In addition, Dutch national government charged city governments with developing plans for an integrated approach to honour-related violence, involving immigrant organizations, police, shelters and gay rights organizations. We looked at the plan for the city of Amsterdam and interviewed the Amsterdam city planner involved in this issue. We also focused on police policy manuals and interviewed the head of police for the National Expertise Centre for Honour-Related Violence. In Germany, these debates take place at both the federal and the state level. We analysed the discussions in the federal parliament (Bundestag) and two state-level (Länder) parliaments: Baden-Württemberg and Berlin, between January 2004 and December 2008. We chose these two Länder parliaments because Baden-Württemberg's parliament and political institutions are generally perceived as conservative toward immigrants whereas Berlin is perceived as more progressive. We analysed debates, motions, and reports that are archived in the Bundestag and in these two parliaments. For Britain, we focused on debates in the House of Lords and the House of Commons that occurred between 2005 and 2008. We also analysed 2008 reports from the Home Affairs Committee, government responses to these reports, and police policies of the past five years. In Canada, we searched through parliamentary records of both the national and provincial governments of Ontario and British Columbia (two provinces that have had cases of honour killing) but without finding any indication that policy had developed or debate had taken place.

Second, for each country we analysed a set of articles reporting on a particular case of honour killing from newspapers with relatively large readerships. In each country, we focused on two quality newspapers that reflect the political spectrum of liberal Left-leaning to liberal mainstream. In the Netherlands, we selected *De Volkskrant* and *NRC Handelsblad*. In the German case, we focused on *die Tageszeitung* (TAZ) and the *Süddeutsche Zeitung* (SD). In Britain, we chose the *Guardian* and the *Daily Telegraph*; and in Canada, the *Globe and Mail* and the *Toronto Star*. We chose quality newspapers because this is where the most in-depth discussions of the honour killing cases on which we focus took place. A search of popular publications netted very few in-depth discussions (see Koopmans et al. 2005:27 for a similar finding). Moreover, by using mainstream newspapers with relatively large readerships in all countries, we ensure that our comparative conclusions are not only the result of the political outlook of a given newspaper (see appendix 2).

Where necessary, we supplemented this with newspaper articles of earlier cases if our analysis of either the newspaper reporting or policy debates indicated these earlier cases had had particular relevance in framing the issue. The newspaper data showed how cases of honour killing were discussed in the public domain, which allows us to discuss how (and to what degree) public framings of honour-related violence informed policy responses to the issue. Here, we distinguish between the media's role as watchdog and agenda setter.¹⁸ The media act as a "watchdog" when newsmakers criticize and comment on the implementation of already existing policy; the media are "agenda-setters" when newsmakers articulate new policy directions that are then picked up by politicians. In certain cases these roles may overlap, particularly when politicians purposefully use the media's agenda-setting role. In the discussion of the findings, we focus more on the media if they currently have an agenda-setting

¹⁸ Birkland 1998, 2004; Dery 2000; Kingdon 2003; Norris and Odugbemi 2008.

role, as in the case of Germany, and less if they have a watchdog role, as in the case of the Netherlands.

Finally, to clarify how immigrant and women's organizations approach these issues, we turned to NGOs involved in parliamentary debates, policy implementation and media discussions. We conducted interviews with key actors, identifying these from newspaper and political debates, gathering information from websites and NGO publications.

A Comparative Analysis of Honour Killing and Honour-Related Violence in Media and Policy Debates

This section focuses on the discourses that were most influential in each country case for the time period under discussion (roughly 2004–2008). Each case starts with an outline of the policy developments. Next we analyse the dominant type of framing in each country. This analysis focuses on whether this framing is stigmatizing, culture blind, or contextually specific. We then discuss how these framings were reflected in policy development, ending with an assessment of the likely impact of these framings on protecting immigrant women and men from these forms of violence.

Honour-related violence in the Netherlands

The Dutch policy approach to honour killing and honour-related violence is more in line with a contextually specific approach than in the other three countries under study. Dutch policy making was initially informed by the media and by NGOs. In the early stages of policy debate (which started in 2004–2005), the conceptualizations of the problem developed in response to a number of murders. NGOs, parliamentarians, police and various social service organizations responded to these murders, discussing them with the relevant minister as well as in the media, which, during this period, functioned as an agenda setter. By mid-2005, the debate shifted to parliament and currently, the media play mostly a watchdog role, pointing out when police or other professionals failed to enact current policy. National and local government have become the primary sites in which honour-related violence is discussed. These governments collaborate closely with various service providers, immigrant groups and the police.

Policy developments: Creating a contextually specific policy

The notion that “honour killing” was occurring in the Netherlands first reached the wider public in 1999 when the press reported on two incidents, one the murder, in broad daylight, of Kezban Vural by her husband, and the second a school shooting incident in Veghel in which a young man of Turkish descent tried to shoot the boy who had been dating his sister. A number of things happened in response. Friends of Kezban started an NGO called Stichting Kezban (Kezban Foundation) to work against domestic violence in *allochthone* communities.¹⁹ In response to the shooting in Veghel, IOT, the umbrella organization for Turks in the Netherlands, started a number of small programmes to address this issue in the Turkish community. However, these efforts did not reach the formal policy-making stage, nor did they receive widespread media attention. While Geert Wilders, then of the Right-Liberal VVD (Volkspartij voor Vrijheid en Democratie or Popular Party for Freedom and Democracy), pointedly asked in parliament whether honour-related violence was a sign that immigrants could not integrate, his questions were dismissed without any policy (or media) response.²⁰

In 2003 and 2004 two additional murders propelled the issue into the formal policy-making arena. Zarife was a high school student whose conflicts with her father had caused her to run

¹⁹ The Dutch often refer to the majority community as *autochthone* (native-born) and immigrant communities as *allochthone* (foreign-born). However, we use the term immigrant communities in this paper, unless quoting someone who uses *allochthone* or *allochthones*.

²⁰ The document containing the question and response can be retrieved by typing KVR513 into one of the parliamentary document search engine (www.overheid.nl).

away from her home and stay in a shelter for runaway girls until her father persuaded her to return to her family home. He then killed her on a family vacation to Turkey. In a separate incident, Mrs. Gül was shot and killed by her husband in front of the women's shelter where she was hiding. In late 2004, these murders led the IOT to collaborate with the umbrella organization for refugees VON (Vluchtelingen-Organisaties Nederland/Refugees Organizations in the Netherlands), organizing a conference with Turkish activists who worked against honour killing in Turkey. These Turkish activists convinced their Dutch counterparts to pursue the creation of a national-level approach to honour-related violence. The IOT and VON made use of the well-established Dutch infrastructure in which immigrant organizations consult regularly with the minister in charge of integration. They requested that Minister Rita Verdonk (VVD) of Integration and Foreigners' Affairs act to prevent honour killing and honour-related violence. In addition, the police were instrumental in bringing the issue to the policy foreground. Women's shelter organizations, who realized that they did not know how to respond properly to honour-related violence, also asked the minister for assistance. Finally, research conducted by TransAct, the National Expertise Centre, on domestic and sexual violence, and issues related to sexuality and ethnicity, indicated that honour-related violence was an issue in the Netherlands but that few organizations were actively involved in addressing it (Bakker 2003, 2005).²¹

In response, the minister, in collaboration with the Minister of Justice, Piet Hein Donner of the CDA (Christen Democratisch Appèl/ Christian Democratic Appeal) sent a letter on 1 November 2005 to parliament outlining three research projects that would become the basis of the integrated response to honour-related violence in the Netherlands (TK 29203 nr. 15).²² First, the Minister charged Bureau Beke, an independent research bureau, with developing a working definition of honour-related violence. Second, the Unit of Multi-Ethnic Policing (MEP) conducted a study on the incidence of honour-related violence, developing an inventory of best practices in police response to such violence.²³ Third, the COT Institute for Safety, Security and Crisis Management (an independent research bureau focusing on security issues) conducted a case study investigating 20 cases of honour-related violence. In the remainder of the 2004–2005 parliamentary session, representatives from various parties across the political spectrum started working on policy development under the umbrella of the standings involved in integration and domestic violence.²⁴ Dutch civil servants from the Ministry of Foreigners' Affairs and Integration, which at the time was housed within the Ministry of Justice, together with the minister of integration and the parliamentary committee on integration developed the most comprehensive policy approach to honour killing and honour-related violence among the four cases we discuss in this paper.²⁵ After the change in government in 2006, the issue remained with the Ministry of Justice, with input from the ministries with integration and domestic violence in their portfolios.

The policy approach to honour-related violence in the Netherlands focuses on three areas: prevention, protection and prosecution.²⁶ In doing so, this policy builds on already existing

²¹ TransAct has since become part of MOVISIE Knowledge Center on Social Development.

²² This document can be retrieved by entering the document number into www.overheid.nl, one of the parliamentary document search engines.

²³ The Unit on Multi-Ethnic Policing evolved into the LEC (Landelijk Expertise Centrum Eergerelateerd Geweld/National Expert Centre on Honour-Related Violence). Headed by Chief of Police Willem Timmer, this police organization provides assistance to all regional police forces in the Netherlands in identifying honour-related violence and trying to resolve conflicts before they escalate into murder or other grave harm (see Janssen 2008a; 2008b, 2009). They have also developed a training manual for the police academies, entitled *Your Honour or Your Life* [Je eer of je leven].

²⁴ Ayaan Hirsi Ali (VVD), Khadija Arib of the PvdA (Partij van de Arbeid/ Labour Party), Nebahat Albayrak also of the PvdA, and Mirjam Sterk of the CDA were key members of this committee.

²⁵ Initially, the programme against honour-related violence received "groot [big] project" status to indicate its importance. Usually reserved for large-scale infrastructure projects, this status has stringent budget reporting requirements that would have been very onerous to follow for the kind of programme development deemed necessary to address honour-related violence. In addition, the rules governing this status do not lend themselves well to developing programmes that cross from national into municipal levels of policy making. As a result, after some debate in parliamentary committee, the groot project status was abandoned; however, the emphasis on honour-related violence as a policy arena of primary importance remained.

²⁶ The development of policy can be traced by reading the parliamentary documents under the number 30388 at www.overheid.nl, accessed on 21 January 2010; see also Brenninkmeijer et al. (2009).

approaches to addressing domestic violence. The prevention pillar primarily involves immigrant organizations that fall under the umbrella of the national immigrant organizations. The IOT, VON and SMN (Samenwerkingsverband Marokaanse Nederlanders/Joint Organization of Moroccan Dutch) jointly developed a multiyear programme entitled On the (B)right Side of Honour. Working closely with these umbrella organizations, local immigrant organizations develop and implement programmes to make services accessible to victims of honour-related violence, to educate service providers on the particular contexts within which domestic violence, violence against women and honour-related violence occurs. In addition, immigrant organizations develop general programmes to make gender equality and gender violence a topic of discussions among a wide variety of immigrant groups. Protection is largely covered by the shelters and other professionals (including the police), and prosecution by the police and the public prosecutor. However, these organizations do not work in isolation; rather, the governance component of the Program Against Honour-Related Violence requires that all these groups work together to exchange information and develop strategies. The programme is currently funded through 2010; after this point, the expectation is that the police and shelters will have developed the necessary expertise to deal with the issue appropriately while the prevention pillar should have been integrated at the municipal level. Overall, the programme aims to comprehensively address honour-related violence as a specific form of domestic violence that occurs within communities of immigrant origin.

Framing the problem: Stigmatization and contextual specificity

By late 2004 and early 2005, the issue of honour killing was hotly debated in the Dutch media in response to the murders of Mrs. Gül and Zarife. In addition, the press gave a broad platform to parliamentarians, like Ayaan Hirsi Ali of the VVD. After parliament received a report that claimed that 100 women in shelters at the time were at risk of honour killing, Hirsi Ali argued that honour killing should be treated as a form of terrorism. In an in-depth interview with the *Volkscrant*, Hirsi Ali's arguments and the discussion of her arguments stigmatized immigrant communities in general and Islam in particular: "You know how it goes. Honour killing is a component of something bigger. It has to do with the sexual morality within Islam, the desire to control women's sexuality. A cult of virginity reigns. A woman who doesn't keep to the rules, can be expelled [from the community] hit, murdered" (Interview by Raoul du Pré, de *Volkscrant*, 4 February 2005).²⁷

Hirsi Ali then proposed that measures, like wiretapping telephones and other intrusive measures used in investigating suspected cases of terrorism should be deployed to track who is involved in the planning and executing of honour killing:

Then we'll have the family members. 'What would be next?' They will be accessories. The most beautiful thing would be if a law was adopted that did not just make the murderer culpable, but everybody who knew of his plans and did not intervene. We should [give those accessories] long sentences. Not doing community service for 240 hours, because they will laugh at us. The immigrant communities live with the belief that society doesn't take this too seriously. The government won't find out, is what they think, and if it does happen [that they find out], we get out of it with minimal sentences. That is how it goes in countries like Saudi Arabia, Pakistan and Iran. But this is the Netherlands. This is a society governed by law (Interview by Raoul du Pré, de *Volkscrant*, 4 February 2005).

In one broad sweep, Hirsi Ali blamed all of Islam for this form of violence and then argued that immigrants have no interest in being law-abiding citizens.

This stigmatizing discourse, however, was not the only frame put forth in media debates. For example, Willem Timmer, superintendent of police, then in charge of the MEP and as of this writing of the police's LEC (Landelijk Expertise Centrum Eergerelateerd Geweld/National

²⁷ Full references to cited newspaper articles can be found in Appendix 2, Data Sources under Newspapers Cited in each country case.

Centre of Expertise on Honour-Related Violence), directly addressed the link between Islam and honour-related violence. Timmer argued that it was more often about culture than religion. According to Timmer: "I also deal with cases that involve Greeks, Italians, and Antilleans." (editors, NRC, 2 February 2005).

Where Hirsi Ali drew from her background growing up as a Somali Muslim woman, Timmer used his expertise as an investigator of a wide variety of honour-related crimes. From this position of expertise, Timmer was able to provide a direct counterweight to the stigmatizing link between Islam and honour-related violence.

Given such counterweights, activists and professionals dealing with honour-related violence were able to develop a pragmatic approach to the problem that focused on how to use available policy instruments to address the specificities of honour-related violence and honour killing. For example, the murder of Mrs. Gül and of Zarife revealed shortcomings in the response of shelters. In the case of Mrs. Gül, her husband had traced her to three different shelters before murdering her in front of the fourth. Discussing the need for secret locations of shelters, Saadet Metin, a filmmaker and activist of Turkish descent, argued for an approach that treated honour killing as related to but also importantly different from then dominant understandings of domestic violence:

'Allochthone women have to receive much more intensive guidance,' says Metin. 'They come from a family culture with a lot of gossip. If after two months the threat has ebbed, they will make a phone call. And information will leak. They will talk about Aisha who is also [in the shelter] and that information will enter the gossip circuit. They aren't fully aware of that. They are lonely; for many Turkish women shelters are a new prison.'

Metin says that the environment of the potential perpetrator, in the mosque, the teahouses, with friends and neighbours, is often aware of what the man is planning. 'Targeted information campaigns in the community is a necessity,' she says. That environment has to have the chance to report this information anonymously, so that the police can act preventatively (Groen, De Volkskrant, 17 March 2004).

Such arguments framed the needs of Turkish immigrant women in the context of their immediate environment in ways that could potentially lead to the stigmatization of the entire immigrant group. However, these arguments were also intensely pragmatic—immigrants are part of the Dutch population, they have the same right to protection and social services as all Dutch residents, and in order that everyone can enact these rights, professionals in shelters and with the police need to adjust to the specificities of these expressions of violence.

While the media played a clear role in putting the issue on the political agenda in 2004–2005, they currently play mainly a watchdog role²⁸. For instance, the murder in June 2007, of Zeynep Boral, a young Dutch law student of Turkish descent, by her ex-husband (and cousin) Serdar Boral, received limited media attention and the reporting focused primarily on the shortcomings of the police in implementing the Program Against Honour-Related Violence, rather than on promoting changes to the understandings of honour-related violence or changes to the policy. At issue was whether the police had responded adequately when Zeynep Boral reported that her ex-husband was stalking her and threatening her with violence. This line of questioning was then picked up by members of parliament who asked the minister to investigate, which he did. The independent report this investigation produced concluded that the police could have known that honour was at stake and that the protection efforts should have been stepped up accordingly. However, it also argued that the Program Against Honour-Related Violence had not been fully implemented at the time of the murder and therefore that the police of Zaandam (the city in which Zeynep Boral lived) was not culpable. Generally,

²⁸ Conversation with Annemarie Bouman, researcher, Free University, Amsterdam, 15 June 2009; interview with Renate van der Zee, independent journalist, 8 June 2009.

though, the media are not pushing a new policy direction at this point in time. Rather, they step in when they suspect limited follow-through on already existing policy directives. Policy implementers such as the police, shelters and NGOs have become much more influential in framing ongoing parliamentary policy-making debate.

Making policy: Navigating stigmatization

After 2005, Parliament, the Executive, NGOs, professional service providers and the police became the sites in which understandings of honour killing and honour-related violence developed. While the issue clearly facilitated stigmatization, and assertions like Ayaan Hirsi Ali's were very influential in putting the issue on the political agenda, policy makers and implementers largely avoided using the issue of honour killing and honour-related violence in ways that stigmatized entire immigrant groups. Three factors played a key role in this. First, political actors largely approached the problem through the vocabulary of domestic violence, a problem that extends into majority society. Second, the active participation of immigrant organizations positioned the immigrants leading these organizations as problem solvers. This disrupted easy attributions of honour killing and honour-related violence as the inevitable outcome of immigrant cultural practices. Finally, the debates on honour killing and honour-related violence took place *after* restrictions on immigration, such as raising the age of marriage migrants to 21 if they come from countries like Turkey or Morocco and requiring new immigrants to pass a language exam *before* they are granted entry visas, had already been passed by the legislature. These measures had become law at the time of the policy development regarding honour killing and honour-related violence. Given that these immigration restrictions were already in place, politicians interested in limiting migration did not benefit from portraying honour killing and honour-related violence as an imported practice that can be stopped by curtailing migration. This created discursive space for a debate on honour-related violence that focused on how this form of violence constitutes a barrier to the participation of immigrant members of Dutch society, rather than a debate on how to keep new immigrants out of the country or a debate on promoting forced assimilation into Dutch culture and society.

The definition of honour-related violence used by parliamentarians and other policy makers facilitated this approach. The definition, developed by Bureau Beke under contract with Minister Verdonk, was quite generic:

Honour-related violence is any form of psychological or physical violence based in a collective mentality and perpetrated in reaction to the (threat of) violation of the honour of a man or woman and by extension his or her family [where the honour violation] is known to the outside world or threatens to become known (Ferwerda and van Leiden 2005:25).

Although this definition did not focus on a particular group in society, everybody involved in the debates knew that immigrants were the targets of these policy efforts. Indeed, in one of her first letters outlining her policy approach, the then Minister of Foreigners' Affairs and Integration, Rita Verdonk, quoted the definition and followed it with "Honour-related violence occurs under specific, social and cultural contexts, mostly within allochthonous groups, and does not have a religious basis. Victims are primarily women and girls, though men are also subjected to honour-related violence" (TK 30388 nr. 6:2).

The notion that particular gender relations produced by specific social and cultural contexts leads to honour-related violence informed subsequent debates. This opened the door to a conceptually specific approach to the issue, in which honour killing and honour-related violence are seen as a form of domestic violence that occurs within immigrant communities, while the caution that honour-related violence has no basis in religion limited (though did not erase) stigmatization on those grounds.

This approach to the problem did not prevent conceptualizations of honour killing and honour-related violence that stigmatized immigrant communities. For example, Minister Ella Vogelaar of the social democratic PvdA (Partij van de Arbeid/Labour Party), who dealt with integration from February 2007 until November 2008, argued:

Honour-related violence will increase in the coming years for two reasons: i) The emancipation process that women experience will coincide with an increase in domestic and honour-related violence. ... ii) Putting honour-related violence on the agenda and opening the subject for discussion will decrease the barrier to reporting violence. As a result, service providers will deal with victims of honour-related violence more often, which is in effect the actual goal (TK 30388 nr. 27:8).

The underlying notion here is that women's integration would cause violence and would make it more likely that women report this violence. Honour killing and honour-related violence were thus constituted as problems of changing gender relations in which immigrant women become Dutch while immigrant men try to hold onto culturally rooted patriarchal powers. This homogenized diversities within immigrant communities and perpetuated stereotypical notions of immigrant masculinity and femininity.

Taking such arguments one step further, Fritsma of the ultra-Right, anti-immigrant PVV (Partij voor de Vrijheid/Party for Freedom) cited a government-commissioned research report by Ada Awareness, an independent research bureau:

Turkish and Kurdish respondents express unanimous understanding for perpetrators of honour killing. It is shocking that this belief broadly lives among these men, not only because the freedom and safety of many women is in dispute, but also because common social norms, such as the equality of men and women and rejecting violence, are undermined (TK 30388 nr. 9:2).

Fritsma positioned the gender relations, which the Labour Party minister identified as obstacles to integration, as the hallmark of the impossible to assimilate immigrant. His party used these debates to further its agenda of expelling immigrants with dual citizenship who commit criminal offences:

Because of the influx of large groups of immigrants from countries like Turkey, Iraq, Iran and Afghanistan, honour killing has become a big problem in the Netherlands. The cabinet wants to solve this problem by making potential victims more resilient, but in doing so, fails to recognize the most important thing, namely, the need to treat perpetrators harshly, even though this is the most important for the victims (TK 30388 nr. 27:2).

Fritsma then generalized and asked the minister to accept his party's plan to make it easier to rescind the residency permit of any immigrant convicted of a crime and to expel them from the Netherlands. However, such requests fell on deaf ears and in a later debate, the minister responded that he was well aware of Fritsma's ideas and that they had been discussed in another forum, implying that they did not need to be discussed again in this context (TK 30388 nr. 33).

In other words, honour-related violence and honour killing were largely conceptualized as resulting from immigrants' culturally specific gender relations. On the one hand, this opened the door to particular forms of stigmatization, which positioned gender equality as the hallmark of Western culture and gender inequality as the mark of the immigrant who cannot and will not be assimilated. On the other hand, it also enabled an understanding of honour-related violence as a specific form of domestic violence within immigrant communities. Indeed, a number of politicians, often those with either close ties to immigrant groups or from immigrant communities themselves, built their policy approaches on this contextually specific

conceptualization of honour killing and honour-related violence. The same held true for the police and high-ranking bureaucrats involved in the implementation of these policies.

The integration of immigrant organizations in prevention efforts created an important avenue for the articulation and implementation of this non-stigmatizing approach. Immigrant organizations working on prevention argued that immigrants should not only be positioned as the source of problems but also as the bearers of the solution. They used the honour killing debates to argue for a need to focus on changing mentalities within immigrant communities, improving people's capacity to take care of themselves by accessing various social services, developing behavioural alternatives, and collaborating with professional parties (such as the police and local women's shelters).²⁹ In short, they used the policy debate on honour killing and honour-related violence to address what they saw as problematic inequalities within immigrant communities and by mobilizing immigrants' own understandings of positive gender relations and familial interactions.

This became clear in how programme managers in immigrant organizations who were in charge of honour-related violence programming adapted the key concepts of the debate. The concept of honour-related violence was a construct created and promoted by the actors making these policies—it is not an organic concept in the communities themselves. As many of the professionals directly involved with people facing honour-related violence argued, women (or men) do not approach shelters, the police or their teachers saying "I'm a victim of honour-related violence," but rather, "my brother is threatening to kill me". This meant that prevention programmes that overtly addressed honour-related violence would not resonate among people from immigrant backgrounds. If anything, immigrants fear that such labels will only further their stigmatization in larger society. People involved in prevention therefore often focused on less charged issues such as how girls and boys are raised, or how marriages are conducted. In addition, they often blurred the sharp distinction between victim and perpetrator, arguing that many perpetrators are forced to commit violence by their families and communities, which in and of itself is a form of violence. Thus, they positioned men in a very different light than the far more simplistic women as victim, men as perpetrator analysis that undergirded much of the parliamentary (and media) discussion in the Netherlands. In general, immigrant and feminist organizations argued for (and received) resources under the Program Against Honour-Related Violence to promote a feminist agenda focused on changing gender relations within immigrant communities. They stressed that this did not mean assimilating into Dutch society but rather finding the bases for changing gender relations *within* their own communities.

Addressing violence against immigrant women (and men)

In general, the policy debates surrounding the Program Against Honour-Related Violence reflected a strong consciousness of a climate of stigmatization and a realization that the debate on honour-related violence could easily further immigrants' sense that they were a stigmatized group. Willem Timmer of the LEC repeated multiple times that increasing the sense of stigmatization would only make the work of the police and others more difficult (interview, 9 June 2009; see also Janssen 2007, 2008c). Andy Clijnk, the Ministry of Justice's program manager voiced a similar sentiment (interview, 11 June 2009).

The debate illustrated the degree to which immigrants—both as individual professionals and as organizations—were full participants in Dutch public debate and policy making. Immigrant organization programme leaders on this issue avoided not only the use of the term "culture," but also the term "multiculturalism" because they felt that it stood for an "us" versus "them" mentality that had given rise to the anti-immigrant politics of Pim Fortuyn and currently Geert Wilders' anti-immigrant PVV. These attempts to avoid using terms that are associated with culture seem to be a reaction to a Dutch political environment that in general increasingly stigmatizes Muslim immigrants by referring to their "backward culture". Despite these

²⁹ See IOT (n.d.). We draw these conclusions from personal interviews with Carola Dogan of IOT, Karima Ouchan of SMN, and Anne-Floor Dekker of VON (June 2009; see appendix 2 for full information).

difficulties, however, actors managed to develop a policy that addressed honour killing and honour-related violence as a form of domestic violence within immigrant communities, rather than as a sign of immigrant backwardness or an indication that immigration should be curtailed.

Ultimately, the focus of Dutch policies against honour-related violence is *integration* not *immigration*. In the Dutch context, this meant that immigrants were approached as full, permanent residents or citizens of the Netherlands, but with group-specific problems. As Clijnk of the Ministry of Justice, put it, “We approach this as a Dutch problem, involving Dutch citizens, requiring Dutch solutions”. Thus, despite the association of honour-related violence with immigrants, a debate on whether those problems should be seen as Dutch, and therefore solvable within the Netherlands, or as foreign, and therefore solvable by restricting imports of foreign ideas and practices, did not take root. Instead, the approach to honour-related violence that has developed over the past five years contains components of multicultural policy making in that immigrant organizations are positioned to deal with prevention within their communities. These organizations are understood to have the specific cultural expertise required. At the same time, other organizations, such as the shelter system, the judiciary and the police force, which do not necessarily have strong ties to immigrant communities or a deep understanding of gender relations and racism, receive training to recognize and respond appropriately to the threat of honour-related violence. Ultimately, this response reflects an ongoing Dutch pragmatism and a focus on individual well-being that structures Dutch social policy making in general (Bussemaker 1993; Korteweg 2006b).

In this policy-making environment, discursive frames that put the focus on immigration as the problem did not become dominant. By copying the three-pronged prevention, protection and prosecution approach from the domestic violence policy that was developed prior to policies against honour-related violence, policy makers created a template that left discussion in the realm of pragmatics with little room for stigmatizing rhetoric. People on the Right, including Minister Verdonk and the ultra-Right PVV Member of Parliament Fritsma, at times referenced cultural competencies of immigrants, and cultural mismatches between immigrant and majority society. However, these ideas did not seem to influence the actual policies produced in any significant way, though they, of course, introduced racialized discourse into the political field. While there was no restrictive immigration policy linked to honour-related violence, there was a persistent perception of immigrant women as better integrated, more willing to adjust to Dutch society than immigrant men. This bifurcation of immigrant communities into good women and bad men needs to be explored and the impact on policy making and implementation needs to be further analysed.

Honour-related violence in Germany

Stigmatizing discourses dominated German media and parliamentary debates on honour killing and honour-related violence. Culture-blind and contextually specific approaches were present but less prominent. Furthermore, while the Dutch case focused squarely on honour-related violence, the German debate often focused on forced marriage, linking it to honour-related violence. These divergent discourses informed a fractured approach to policy making; politicians debated the issues extensively, but they did not produce a coherent set of policies to address honour-related violence. In addition, where in the Netherlands the media had a watchdog role, the German media were more clearly involved in agenda setting, while police were absent from policy-making discussions. NGOs that have a focus on immigration issues and immigrant women’s NGOs have so far a much more limited influence than in the Netherlands.

Policy developments: A piece-meal approach to policy making

Initially, honour killing came to the attention of parliament members along with the issues of forced marriage, through the campaigns of a women's NGO, Terre des Femmes,³⁰ in 2003, and a report entitled *Life Situation, Security, and Health of Women in Germany*, published in 2004, while Renate Schmidt (Sozialdemokratische Partei Deutschland/Social Democratic Party, SPD) was the Federal Minister of Family, Elderly, Women and Youth (Bundesministerium für Familie, Senioren, Frauen und Jugend 2004; interview with a lawyer and a member of *Terre des Femmes*, Regina KaltheGener, 24 February 2009). Both the campaign and the report overtly linked honour killing and honour-related violence to forced marriage; however, neither issue garnered much attention in either the press or parliament.

In 2005, the brutal murder of 23-year-old Hatun Aynur Sürücü by her brother sparked a public debate on family violence within Muslim immigrant communities, especially honour killing, in Germany. Newspapers claimed that this was the sixth such murder in Berlin in a year. Hatun Sürücü's murder coincided with the publication of Turkish-German sociologist Necla Kelek's controversial book *Die Fremde Braut* (The Foreign Bride,³¹ 2005). This book, and a number of other publications, linked the lagging socioeconomic participation of Muslim immigrants in Germany to particular forms of gendered violence. Hatun Sürücü's murder and Necla Kelek's book triggered extensive media debates on honour killing and gender unequal practices of Turkish immigrants.³²

After the newspapers brought the issues of honour killing and forced marriage to the foreground in 2005, both the federal parliament and two state parliaments studied (Berlin and Baden-Württemberg) began debating honour killing, honour-related violence and forced marriage. Despite newspaper reporting that treated honour killing as a separate issue, politicians tended to see honour-related violence either as the result of, or at least related to, forced marriage. Consequently, they proposed policies that would raise the age of marriage for spouses from countries like Turkey and extend the residency permit of immigrants living in a forced marriage situation abroad (normally, a residency permit expires six months after leaving Germany). Neither proposal passed; selectively raising the age of marriage was considered unconstitutional, and the residency permit extension foundered in the absence of support for it by the CDU (Christlich Demokratische Union Deutschlands/Christian Democratic Union). Other proposals to address forced marriage and, by extension, honour-related violence, such as making forced marriage a prosecutable form of coercion and requiring that new brides (and grooms) learn German abroad before gaining an entry visa have since been passed by the coalition government of the CDU and Social-Democrats (SPD, Sozial Demokratische Partei Deutschlands/Social Democratic Party). However, these highly contentious policies and policy proposals have not resulted in a comprehensive strategy against honour-related violence or forced marriage. Although parliamentarians and policy makers across the political spectrum maintain that forced marriages and related violence in immigrant (especially Muslim) communities must be stopped, policy development remains limited and factious.³³

Corinna Ter-Nedden, a psychologist at the Papatya e.V., a women's shelter in Berlin that caters to immigrant women, noted that there are local initiatives to fight against honour-based violence; however the efforts of these local groups have not influenced policy making at the federal level. According to Ter-Nedden, local groups, such as immigrant women's organizations, are not organized sufficiently to establish a network and influence policy making in Germany (unlike in the Netherlands and Britain, as shown below). In other words, there was a lack of both horizontal interaction between local initiatives, especially those of immigrant

³⁰ Terre des Femmes is a women's organization in Germany, specializing in such issues as human trafficking, forced marriage and female genital mutilation.

³¹ For a critique of Necla Kelek's work, see Beck-Gernsheim (2006) and Yurdakul (2010).

³² SD Politik, 21 February 2005 Ewing 2008: Korteweg and Yurdakul 2009.

³³ See, for example, the motions introduced by FDP (Drucksache 16/1156), *Die Linke* (Drucksache 16/1564), Bündnis 90/Die Grünen (Drucksache 16/61) and various parliament members in the *Bundestag* (Drucksache 16/4910) including CDU and SPD. These can be found at <http://www.bundestag.de/bundestag/index.jsp>.

organizations, which create strategies to fight against honour-related violence, and vertical integration of such efforts into policy making at the federal level (Ter-Nedden, e-mail correspondence, 2009).

Framing the problem: Stigmatization and its alternatives

In newspaper reporting, discussions of honour-related violence and forced marriage were often jumping off points for descriptions of the entire Muslim immigrant community as backward, patriarchal and generally having the wrong kinds of values. The stigmatizing comments came both from German and immigrant political figures and newsmakers (Yurdakul 2010). When actors did focus on the particulars of honour killing, honour-related violence and forced marriage, they treated them as forms of domestic violence, but they rarely placed them in their particular context. In other words, German policy and media approaches were not informed by the specific social and historical conditions in German society that shape domestic violence in immigrant families.

Rather than addressing the actual problem at hand, in both the media and parliamentary debate, honour killing and forced marriage were strategically mobilized to position immigrants in Germany as outsiders, creating sharp boundaries of “us” and “them” that immigrants can only cross by adopting the values and practices of majority society.³⁴ A prominent avenue for such boundary formations linked honour killing to a general failure to respect women’s rights, and therefore to uphold one of the fundamental values of liberal societies. For example, newspapers reported that three young Turkish men attending the Thomas Morus Oberschule in Neukölln had said that Hatun Sürücü’s brothers were right to kill her because “the whore lived like a German” (Ramelsberg, *Süddeutsche Zeitung Politik*, 2005: 5-9). The school director wrote an open letter denouncing this sentiment. The subsequent reporting on the students’ assertions and the school director’s actions linked Hatun Sürücü’s murder to a wider problem of Turkish immigrants’ failure to support gender equality. In this context, reporting that the brother who murdered Sürücü received a golden watch from his father as a reward for killing his sister was no longer evidence of extreme violence perpetrated by a particular family but became evidence of the existence of an entire community subscribing to the values that informed the murder (Bullion, *Süddeutsche Zeitung Panorama*, 12 April 2006:10).

As the stigmatizing debate on values developed, the question became whether honour had its roots in Islam as a religion or as a culture. Here, immigrants who had crossed the bright boundary into majority society played a prominent role. For example, Necla Kelek argued that girls are worth less than men, because “they come to the world for men” in “Muslim thought” (TAZ 23 September 2005; Necla Kelek, interview by Jan Feddersen and Martin Reichert). Others, such as *Frankfurter Allgemeine Zeitung* writer Mark Siemons focused on culture and said that “Islam cannot be made responsible here. ... [I]t is actually the culture, which is so murderous” (Siemons, *Frankfurter Allgemeine Zeitung*, 3 March 2005:37).

By moving the discussion from the particularities that produce honour-related violence (and forced marriage) to general discussions of “Turkish” or “Muslim” culture, the media created a problem definition in which addressing the purported existence of parallel societies based on divergent values became the solution to the problem of honour-related violence (see also Gilroy 1991). As politicians took positions on honour killing, some CDU leaders portrayed Turks as living in their own urban enclaves (*Parallelgesellschaften*), having little contact with Germans and establishing their own norms and rules against the common good of the German society, especially against gender equality. For example, the President of the CDU Fraction in the Berlin Parliament in 2005, Nicolas Zimmer, argued: “The concept of so-called multicultural society failed. It supported the establishment of parallel societies and the segmentation of cultural groups with their value systems. This leads to the worst form of self-justice: the so-called honour killing” (CDU *Fraktion*, Berlin, 14 September 2005). Zimmer then pushed the corollary

³⁴ See Barth 1996; Zolberg and Long 1999; Alba 2005; Korteweg and Yurdakul 2009.

argument that the problem of both parallel societies and honour killing would be solved if immigrants adopted German values: “Whoever wants to live in Germany must respect our constitution, and accept and tolerate the liberal values of our society. Those who cannot do this, must go back. We will never tolerate an import of religious fanaticism” (CDU *Fraktion* Berlin, Presse Release, 13 April 2006). Zimmer reduced the debate to one about “our” and “their values” and linked “their values” to religion, implying that Islam is at fault. The stigmatization of the German Turkish community as a whole positioned community members as outsiders to Germany, where their outsider status resulted from their religious difference.³⁵ Such approaches homogenize the complex allegiances among immigrants and between immigrants and non-immigrants.

Some leaders from Turkish communities in Germany tried to provide an opening to a contextual approach to honour killing; they were critical of stigmatizing political discourses, such as Zimmer’s, and opposed the underlying treatment of immigrants as outsiders. Contesting stigmatizing characterizations of the problem, Giyasettin Sayan (German-Kurdish member of the party, *Die Linke*, (the Left party in Germany) argued in the Berlin Parliament that immigrants should be considered part of German society and that deporting immigrants was not a solution to the problem:

The statement that the family has not managed to become a part of German society, locates the problem outside of our society. This leads to dangerous conclusions beyond the concrete cases: As people leave, the problem will be solved. But the real causes are part of our society and that is where they can be solved (Sayan, Press Release, Die Linke Fraktion Berlin, 18 April 2006).

This approach positioned immigrants as full members of German society and contrasted sharply with that of the CDU.

Safter Çınar, spokesperson of the Türkische Bund Berlin-Brandenburg, provided another alternative discourse. Çınar attempted to relieve the tension between “us” and “them” by introducing the human rights discourse as a common ground to which both German and immigrant values should adhere: “We maintain that honour killings, forced marriage, and the oppression of women are not compatible with our religion. But the majority society, too, has to finally stop discussing German values as values that foreigners have to adjust to. It is not a matter of German or Turkish values. It is about universal human rights” (am Orde, TAZ, 22 February 2005).

People like Çınar mobilized the human rights discourse to show that Turkish immigrants in Germany have the right to be treated as full members of German society. Though Çınar did not make this argument, this discourse could conceivably lead to a contextually specific understanding of honour killing and forced marriage, one in which the rights of those involved are violated in particular ways and in which they have a right to protection, just like all full members of society. The universal human rights discourse, however, did not appeal to the newsmakers, and the stigmatizing debates on the clash of German and immigrant values continued in news reports.

Policy making: The dominance of stigmatization

In parliamentary debate, politicians discursively connected honour killing to forced marriages. We analyse the parliamentary debates on forced marriages to gauge how politicians addressed honour-related violence. Transcripts of parliamentary debates show that parliamentarians in the Bundestag and Länder parliaments argued that forced marriages restrict personal freedom, threaten personal safety and negate human rights (also see *Aktionsplan der Bundesregierung zur Bekämpfung von Gewalt gegen Frauen I und II*) and—tied to the issue of honour killing—stated

³⁵ For similar debates for the case of German Jews, see Yurdakul and Bodemann (2006) and Lavi (2009).

that forced marriages, which they perceived as a common occurrence in immigrant families, can lead to honour-related violence (Bundestag, 8 November 2006, Drucksache 16/61).

Unlike their Dutch counterparts, German politicians failed to develop a comprehensive policy against honour-related violence. Media arguments that honour killing is the result of an inability to be more German led to policy making that focused on the integration of immigrants in general, rather than on the specificities of honour-related violence. Integration meant different things to the members of different parties, ranging from the more assimilationist interpretation of the CDU and its focus on German values to the arguments of Die Linke that immigrants are already full members of German society but lack recognition of their membership. The deep divide between political parties informed a fractured political process, with politicians mobilizing around different approaches to integration, and ultimately this prevented the development of targeted policies against honour-related violence.

Parties like the CDU linked integration to work efficiency and saw criminality as having a negative ripple effect on immigrants' capacity to be employed. For example, in a parliamentary debate in Baden Württemberg Parliament, integration was explicitly defined as immigrants' employment. They believed that immigrants should only work and refrain from involvement in any criminal acts. The party members aimed to pass regulations to punish perpetrators of honour-related violence. They consider that involvement in criminal acts decreased their work efficiency (Plenarprotokol 14/7, Landtag von Baden-Württemberg, 26 July 2006).³⁶ Such criminalization of the problem usually provided little protection to the victims (interview with lawyer Regina KaltheGener).

In contrast to the criminalizing attitude of the CDU, parties on the Left like the Bündnis 90/Die Grünen (Alliance 90/The Greens) focused on protection of the victims of violence. Their motion, Fighting against Forced Marriage, Protecting the Victims (Bundestag, 8 November 2005, Drucksache 16/61), lamented the limited services available to victims and argued for additional victim protection and prevention alongside legal improvements. The motion also argued for a federation-wide study on forced marriage, an encompassing protection programme for the victims of forced marriage, interculturally oriented protection and counselling centres, programmes for parents and boys, as well as prevention work at schools. Throughout, the motion emphasized that these measures should involve collaboration with communities of immigrants/immigrant women. The Bündnis 90/Die Grünen's emphasis on prevention and protection by fostering the cultural competence of front-line professionals working with victims of violence and the full inclusion of immigrant communities, particularly immigrant women, echoed the Dutch approach to honour-related violence.

Even though the neoliberal FDP (Freie Demokratische Partei/Free Democratic Party) is not a pro-immigrant party per se, its liberal philosophy of universal rights led some members of the FDP to make arguments that were similarly focused on the specificities of honour-related violence. In debates on how to approach forced marriage, Sybille Laurischk, FDP Federal Parliament Member argued that immigrants should not be required to learn German before immigrating; the right of return should be extended; women should be given an independent residence permit without having to wait two years; and more protection and social assistance services should be developed and made available. Finally, she claimed that budget cuts to women's shelters exacerbated the vulnerability of women who are victims of, or have been threatened with, forced marriage. In making the case for these policy changes, Laurischk approached forced marriage as a form of domestic violence and then looked at the specificities of the migration experience that rendered women particularly vulnerable. Although she did not strongly advocate approaching immigrants as full members of German society, she moved away from positing integration policies as the solution to these social problems.

³⁶ These can be found at <http://www.landtag-bw.de/dokumente/>.

Despite the presence in parliamentary debates of approaches that treated forced marriage and honour-related violence as complex problems that needed complex policies, these arguments did not translate into targeted policy approaches to this form of violence. Arguments put forward by ruling party politicians, particularly by the CDU, which mobilized honour-related violence to advocate for general integration policies were much more influential. For example, Michaela Noll, CDU Federal Parliament Member, argued:

It is our goal, to enable arriving spouses in Germany to have a self-determined life, because only then do they have a chance at integration. Yet this is only possible through language. ... Knowledge of the German language is an important factor for me with respect to victim protection. How else should a young woman, who is to enter a forced marriage, be able to defend herself here? Only if she has this basic knowledge will she be able to call attention to her emergency and say that she is in need of help. It will not work otherwise. I believe that in the long run this is a measure, to protect girls from becoming import brides (Bundestag:15127).

It is hard to dispute that the young woman in Noll's example would benefit from knowing German; however, language proficiency would not be enough. It is clear from the Dutch case that shelters and police need specific knowledge to protect women at risk of honour-related violence. But where in Germany could this young woman get help in her forced marriage situation in the absence of policies instituting widespread programming in shelters targeting such issues? How would police and other professionals receive her if these front-line workers lack specific knowledge and understanding? Although some expert knowledge is present in localized cases (for example, the Papatya shelter in Berlin), this is not because of politicians' policy-making efforts.

Sevim Dağdelen, federal parliament member for Die Linke, clearly indicated that she saw the actions of the CDU/SPD federal coalition government as wilfully obstructionist. In the parliamentary debate on forced marriage, she argued, "Everyone here agrees that forced marriage is a form of violence, yet this debate shows that the Union [CDU] has used it not only to distract us from the failure of previous governments in matters of social and integration policies, but in order to stigmatize immigrants of a Muslim background as backward and inferior" (Bundestag:15130). She further stated that this "finger-pointing" has made the task of protecting the women affected by this form of violence more difficult. Finally, she accused the coalition of the ruling CDU and SPD of using the plight of women to hinder immigration, not forced marriage.

The coalition of CDU and SPD that governed when these debates took place ultimately mobilized around the issue of forced marriage and honour-related violence in ways that aimed to turn Muslims/Turks into Germans (Yurdakul 2009). The federal-level discussions on honour-related violence targeted women who had recently arrived or were attempting to come to Germany, rather than women who were experiencing such violence in Germany as long-term residents or German citizens. Moreover, the policies now put in place require that marriage partners learn German before entering Germany and upon entering Germany, spend more hours in compulsory language courses. Politicians from the coalition argued that both measures would make marriage partners more independent. However, these policies also make immigration more difficult and function as immigration restrictions. In addition, the CDU/SPD coalition put forth a motion to increase the age of marriage for certain immigrant communities to 21. Again this would put a barrier to immigration, though the CDU/SPD stated that this was an attempt to ensure that spouses make informed decisions about their marriage partners. This motion floundered because of its unconstitutionality. All of these immigration and integration policies, whether adopted or proposed, presume an immature and dependent person (presumably a woman) who could potentially be victimized by a Turkish immigrant family in Germany. Such presumptions further the stigmatization of immigrant communities and enable restrictive immigration policies even as they purport to help immigrant women.

Addressing violence against immigrant women

Despite the apparent consensus across the political spectrum that honour killing and forced marriage should be addressed by government policy, actual policy making has remained limited. On the one hand, the predominance of a stigmatizing discourse enabled the ruling parties to push for integration measures related to compulsory language courses. Although there was consensus that honour killing and forced marriage were forms of domestic violence, the absence of either a strong anti-domestic violence policy domain³⁷ or a contextually specific understanding of honour-related violence and forced marriage led to a failure to develop a comprehensive set of policies against honour-related violence in Germany.

In the end, discussing honour killing in the context of immigrant integration debates limited politicians' capacity to address it as a specific form of violence against women (Abgeordnetenhaus, 21 June 2005, Drucksache 15/4110). The clash of cultures debate fostered the instrumentalization of honour-related violence and put the real and urgent issue of violence against women on a secondary agenda (Yurdakul and Spielhaus 2009; Yurdakul 2010). Many politicians, especially from opposition parties, questioned how stigmatization and the proposed changes such as increasing the age of marriage for immigrants and introducing compulsory language classes for spouses who want to come to Germany, can prevent forced marriages and protect victims (see, for example, Member of the Bundestag for the Greens, Schewe-Gerigk 2007).

Even parliamentarians who challenged the stigmatization accompanying discussions of honour killing and forced marriage in Germany lacked an alternative framing. Without a clearly articulated understanding of these forms of violence as contextually specific, the debate reached a stalemate. The Christian Democrats framed honour killing and forced marriage as problems of unintegrated Muslim families that could most effectively be remedied by adopting vaguely defined German values. The Left parties echoed the Dutch approach, positioning honour killing and forced marriage as immigrant-related but ultimately problems of German society that should be handled as forms of violence against women. We argue that the identifications of honour killing and forced marriage as domestic violence without consideration of social and historical conditions of immigrants in Germany will not strengthen immigrant women's status in Germany. A contextualized approach that addresses racism, sexism and socioeconomic discrimination is needed to deal with problems faced by immigrant women. Although this understanding is shared to some degree by representatives from opposition parties, important motions by these parties that suggested better protection of immigrant women from domestic violence were not turned into policy.

Honour-related violence in Britain

In the British case, stigmatization was counterposed by contextually specific understandings of honour-related violence in complex ways. On one hand, this resulted in approaches that echoed the Dutch approach to honour-related violence. On the other hand, these approaches were not as comprehensive as in the Dutch case. Media and NGOs both had a clear influence on setting the policy agenda, while much actual policy development happened in collaboration with the police and the Foreign and Commonwealth Office. Parliamentary debates focused primarily on the prevention of forced marriage, only recently developing a more general policy approach to honour-related violence. Overall, British policy development, unlike the Dutch case, lacks an integrated national approach that brings all parties involved in preventing, protecting and prosecuting these forms of violence around the table.

Policy developments: Moving toward a comprehensive approach?

British media and policy debates initially focused primarily on forced marriage but over time these debates positioned forced marriage together with honour killing (and female genital

³⁷ According to Bundesministerium für Familie, Senioren, Frauen und Jugend (2004), one out of four women is subjected to domestic violence in Germany, yet funding for services has been cut.

mutilation) as forms of honour-related violence (often using the term “‘so-called’ honour-based violence” to indicate that such violence can never be honourable).³⁸ Immigrant and ethnic minority women’s groups realized that honour-related violence and forced marriage were problems faced by their communities. As in the Netherlands and Germany, media reports of honour killing and forced marriages – such as the murder of Rukhsana Naz in 1998 and the case of “Jack and Zena” Briggs³⁹ who were on the run from her family from 1992 onward – made parliament responsive to the efforts of these groups to put these issues on the political agenda. In response to NGO pressure the British Home Office established a working group on forced marriage in 1999. This group included representatives from various NGOs and produced a report entitled *A Choice by Right* that informed subsequent policy approaches.⁴⁰ These efforts framed the discussion of honour killing and honour-related violence through the lens of forced marriage.

After the publication of *A Choice by Right*, the Foreign and Commonwealth Office established the Community Liaison Unit in 2000 (Dustin and Phillips 2008). The unit was transformed into the Forced Marriage Unit in 2005 and was instrumental in the adoption of the Forced Marriage Act in 2007. The Forced Marriage Unit, which is still part of the Foreign and Commonwealth Office but which now operates in conjunction with the Home Office, assists British citizens (and sometimes legal residents)⁴¹ abroad who are forced into a marriage, to help them resist the marriage, seek legal advice, or to repatriate them to Britain (FMU website).⁴² Currently, the FMU also provides assistance to people within Britain as well but initially, the FMU was criticized for focusing too little on the needs of women (and men) living within Britain, and too much on facilitating the denial of entry visas to racialized groups of immigrants (Dustin and Phillips 2008).

The issue of forced marriage within Britain was also taken up by the House of Lords in 2007, which developed the Forced Marriage Act. This Act, adopted in 2007, provides civil protection to victims or those who are at risks of becoming victims of forced marriage and allows those at risk of forced marriage, those in a forced marriage or third parties to apply for a protection order at the courts.

An explicit focus on honour-related violence comes to the fore in the 2004 changes to the Domestic Violence Act. These changes facilitate the prevention, protection and prosecution of honour-related violence and forced marriage under the larger domestic violence umbrella. Reports by the Home Affairs Committee indicate that current efforts focus on bringing multiple actors to the policy-making and implementing table (HAC 2008a and 2008b). As in the Netherlands, these documents frame comprehensive policy as involving various professionals and service providers, including immigrant women’s organizations, shelter providers and services for minors at the local level (HAC 2008a and 2008b).

The Metropolitan Police Service in London has also been instrumental in addressing honour-related violence. It established a task force to address honour killing in 2003 and has been a major participant in the development and implementation of the Forced Marriage Act (ACPO 2008; Dustin and Phillips 2008). The Association of Chief Police Officers of England, Wales and Northern Ireland has recently developed a strategy to address honour-related violence in which they treat forced marriage and honour killing as two forms of honour-related violence (ACPO 2008) and attempt not only to protect and prosecute, but also prevent violence.

³⁸ While the term honour-based violence is commonly used in British debates, we will use the term honour-related violence to maintain consistency throughout the paper.

³⁹ Pseudonyms used by the British media.

⁴⁰ www.fco.gov.uk/resources/en/pdf/pdf14/fco_choicebyright2000, last accessed 30 September 2010.

⁴¹ For example, the FMU assisted in the case of Dr. Humayra Abedin, who was taken to Bangladesh, her country of origin, by her parents who forced her to marry there (*Times*, 15 December 2008).

⁴² www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/, last accessed September 30, 2010. For the detailed changes in the development of the FMU, see Phillips and Dustin (2004) and Dustin and Phillips (2008), Deveaux (2006), Siddiqui (2005).

NGOs have played a key role in producing these policy efforts. Parliamentary and police policy documents cite long lists of NGOs they consult with, including immigrant women NGOs such as the Southall Black Sisters, the Newham Asian Women's Project, the Iranian and Kurdish Women's Rights Organization, Karma Nirvana and Imkaan. All these groups engage in advocacy and community service for immigrant communities. They have been extensively consulted, and are often cited in passing legislation. Some of them have received the resources to engage in the kind of preventive work within their communities that takes place in the Netherlands. However, others did not receive funding or had their funding cut back because of the recent developments on Preventing Violent Extremism, a government strategy to combat terrorism in Britain which partially diverted funding from Muslim organizations.⁴³ While NGOs are consulted and are positioned as key actors in the prevention of forced marriage, honour killing and honour-related violence, there is currently no comprehensive national policy which gives them a defined and funded role.

While Britain seems on its way toward developing a comprehensive policy approach, immigrant women's NGOs have identified a number of other serious shortcomings in current policies. One of the most pressing ones is the "No recourse to public funds" policy, which grants immigrants a visa on the condition that they do not appeal to public funds. Shelters are funded out of women's public funds, and therefore immigrant women without a welfare grant often cannot find shelter space. After campaigning for 20 years, there is now a temporary solution in place to address this, while SBS is working with the relevant government ministries and other organizations to find a permanent solution.⁴⁴ In a related issue, the practice of making women's residency permits dependent on their marriage for their first two years in Britain renders women extremely vulnerable to abuse (HAC 2008a; however, see government reply, HAC 2008b). The issue of third-party intervention in (suspected) cases of forced marriage is also contested – while it enables police officers, educators and anyone else with an interest in a case to file a formal complaint, it also renders immigrant women vulnerable to unwanted interventions by strangers. Finally, the fact that the Forced Marriage Unit is still housed in the Foreign and Commonwealth Office continues to give the impression that forced marriage involves new immigrants, and not spouses who are both British citizens or residents (Dustin and Phillips 2008).

In sum, the British policy approach to honour-related violence is more comprehensive than Germany's, containing many of the elements of the Dutch approach. However, there is less formal integration between those professionals most likely to be able to prevent, protect or prosecute than in the Netherlands. In addition, while in the Netherlands, the infrastructure to support the policy is present, this does not seem to be the case in Britain. Rather, with the exception of the work of the FMU, the work of fully addressing honour-related violence seems to be at the stage of recommendations and pilot programmes in the areas of police practice and the integration of local immigrant community groups and shelter providers. There is not a clearly developed or implemented comprehensive approach to honour-related violence. Finally, current British policies seem to be simultaneously contextually specific *and* stigmatizing. The following subsection shows that this is the result of discourses that frame certain groups of immigrants as not being fully part of British society.

Framing the problem: Stigmatization and contextual specificity

Honour killing, honour-related violence and forced marriage have been extensively discussed in the British media over the past decade. To capture the ways in which the problem is currently framed, we focus on the reporting on the murder of Banaz Mahmod on 23 January 2007. Banaz, a 20-year-old British citizen of Iraqi Kurdish background had been forced to marry at the age of 16 and, after a divorce, had found a boyfriend. Her father and uncle disapproved

⁴³ For more information, see "Preventing Violent Extremism" (2007). www.communities.gov.uk/documents/communities/pdf/320752.pdf, accessed on 23 January 2010.

⁴⁴ SBS website, www.southallblacksisters.org.uk/, last accessed 30 September 2010.

of the relationship and ordered her murdered. She was killed by three young men (some news reports state after being tortured and sexually assaulted). According to the press, Banaz had gone to the police four times to report threats but the police officers had failed to take her seriously. In one incident, Banaz had fled by breaking a window after her father had given her liquor. In the hospital she told a police officer that she feared her father was going to try to kill her (a chilling video clip of her assertions, taped by her boyfriend, is available on YouTube). In her report, the officer recorded that Banaz was melodramatic and did nothing to investigate Banaz's allegations. In their fourth and last interaction with Banaz, officers did offer to find her a shelter place or to give her a portable alarm but Banaz refused, allegedly stating that her mother would be home and would protect her.

There were two trends in the reporting of the murder. First, the media stigmatized immigrant communities in general and Muslim immigrant men in particular. Second, the media blamed British multiculturalism, which they associated with a fear of appearing racist when treating culturally specific problems, for the police's failure to protect Banaz. Newspaper reporting countered this by arguing that immigrants should be treated as full members of British society. This opened the door to the possibility of seeing honour-related violence as a contextually specific problem within immigrant communities.

In terms of understanding the problem, in the newspapers and parliamentary debates, immigrants from countries that have considerable Muslim populations were positioned as practicing forced marriages and honour killing, in contrast to other regions, such as Latin America or Southern Europe, where honour-based violence is present but rarely discussed in the media. For example, in the reporting of the *Guardian*: "Most 'honour' crimes involve families from south Asia, but they have also included Nigerian, Turkish, Algerian and Kurdish families" (McVeigh, *Guardian*, 22 November 2007:3). Discussing threats that Banaz Mahmud's boyfriend received prior to her murder, the newspapers reinforced a sense of "us" and "them":

On January 22, 2006 it was Mr Sulemani's turn. A group of Kurdish men tried to abduct him from a street in Hounslow. He escaped, but was told: 'We're going to kill you and Banaz because we're Muslim and Kurdish. We're not like the English where you can be boyfriend and girlfriend. We're going to leave but we'll be back again' (McVeigh, *Guardian*, 11 June 2007).

This quotation, as selected by the newsmakers, gives voice to Muslim men who reject integration in British society because of their different understandings of gender relations. Similar to the German newspaper debates, the selection of such quotes emphasized that Muslim men were the perpetrators of gendered violence. Furthermore, this quotation echoed the German values debate, by framing the problem of honour-related violence as an indication of a generalized failure to comply with the values of British society. These young men were punishing a fellow immigrant for appearing to have adopted English practices. Yet in British reporting, it was immigrant *men* rather than the entire immigrant community, who were marked potential criminals, even in some reporting as terrorists. This argument positioned these men, and the entire Muslim community that they apparently tried to be in charge of, as unwilling to change and unwilling to abide by the rules and values of British society.

The second discourse regarding honour-related violence centred on a rejection of multiculturalism. This discourse suggested that politicians' and professionals' fear of interfering with cultural practices of minority communities led to limited policy development. In the discussions of the police's failure to adequately intervene in Banaz's case, British multiculturalism received the blame. For example, Jonathan Wynne-Jones, religious affairs correspondent for the *Daily Telegraph* wrote: "Local authorities are not acting because of 'political correctness' and a fear of being accused of racism" (Wynne-Jones, *Daily Telegraph*, 3 February 2008). Women from minority groups made this argument forcefully. Jasvinder Sanghera, director of Karma Nirvana, a women's organization which supports victims of honour-related violence, argued that "I have met well-intentioned police officers, teachers and

GPs who have fear of getting it wrong and a fear of being called racist” (cited in Emine Saner, *Guardian*, 14 March 2008). Indeed, Rahila Gupta, journalist and member of the Southall Black Sisters (SBS), accused the police of failing to protect women like Banaz because of a warped sense of respect for cultural differences:

Those working with women escaping domestic violence are familiar with police inaction, failure to take allegations seriously, and reluctance to intervene in “cultural” practices. ... After all the progress that has been made in terms of legislation such as the Domestic Violence, Crime and Victims Act 2004, public awareness, zero tolerance of domestic violence and vast quantities of police training, the police officer thought that Banaz was being melodramatic! (Gupta, *Guardian*, 12 June 2007).

These discourses provided a counterpoint to the argument that Muslim men cannot change their ways. Rahila Gupta focused on the police’s failure to learn from their mistakes, while *Guardian* journalist Karen McVeigh, citing various police officers, concluded that lack of formal training was the reason that Banaz was not provided with adequate protection (McVeigh, 12 June 2007:1).

In other countries, multiculturalism might be construed as providing a discourse that justifies the recognition of difference in policing and policy making more generally (for example, in Canada and the United States). However, in the discussion of Banaz’s murder, multiculturalism was seen as the justification for neglecting the specific needs of people from immigrant communities. The critique of multiculturalism then opened the door to an argument that the police needed to understand the contextual specificities that inform honour-related violence. Indeed, Jasvinder Sanghera, the director of Karma Nirvana, followed her criticisms of the police’s misplaced multiculturalism with the argument that “‘Honour’-based violence is far more complex than ‘typical’ domestic violence and the police are not being trained in how complex it is” (Saner, *Guardian*, 13 June 2007:17). However, rather than jettisoning multiculturalism altogether, some immigrant women intimately involved in shaping debate on the issue of forced marriage proposed a “mature multiculturalism,” a term that we only found in Britain, which was coined by the SBS joint-coordinator Hannana Siddiqui (see also Phillips 2007; Gupta, *Guardian*, 12 June 2007). In a nutshell, mature multiculturalism is “a respect for diversity but also state intervention to protect human rights in all communities” (Gupta 2007). Thus, in this second frame, honour-related violence became a violation of human rights. Furthermore, to remedy this violation required the recognition of contextual specificity. The next subsection shows that this latter interpretation of how best to address honour-related violence to some extent counteracted the stigmatization associated with the first framing of the issue.

Making policy: Rejecting multiculturalism and adopting contextual specificity?

British parliamentary debates and policy documents did not directly reference media discussions but seemed to operate on parallel tracks, and the two discourses that dominated media debate appeared in different guises in parliamentary discussions. The following does not present an analysis of all parliamentary debates and policy statements but rather provides examples of general trends in discussions of forced marriage and honour-related violence.

Stigmatizing discourses among British politicians were less blatant than in the media but came to the fore in the often imprecise conceptualization of honour in policy and parliamentary debates, which prevented an understanding of the complexities of violence informed by “so-called honour”. For example, while making references to Turkey, politicians used the word *izzat*, which is an Urdu word for honour, though in Turkish the word would be *namus*. Thus they homogenized all “honour” concepts, disregarding divergent practices of different groups and putting all Muslims in one category with no differentiation (House of Lords, Hansard texts, 15 December 2005).⁴⁵ Another important stigmatization discourse came to the fore in the

⁴⁵ All Hansard texts that are referenced in this paper are available at www.parliament.uk/.

attempts to make the eradication of honour killing a condition for Turkey's candidacy for the European Union (Hansard texts, 15 December 2005). This makes it seem that Turkey would have no independent interest in addressing this form of violence and that countries like Turkey cause the problem, rather than seeing immigrant issues as fully part of British social problems. Such statements also instrumentalized the issues of violence against women to wage a political battle over whether Turkey, a country of 99 per cent Muslim population, should become a member of the European Union.

While there were few blatantly stigmatizing discourses, a concern with women and girls as victims echoed colonial discourses of Britain's civilizing mission. For example, the Forced Marriage Act of 2007 was initially introduced by Lord Lester of Herne in the House of Lords as a private member's bill. In his advocacy for the Bill, Lord Lester argued that the British government had an obligation to protect "children and young people of either sex". Furthermore, Lord Lester stated that:

Ram Mohan Roy, the great Bengali social reformer, made common cause two centuries ago with British Benthamites in abolishing the practice of sati. Mahatma Gandhi acted similarly in securing the 1929 Act on Hindu child marriages during the British Raj. Today, the abolition of forced marriages and associated evils will be effective only if there is clear and bold leadership from within minority communities, making common cause with mainstream leaders, irrespective of religious, ethnic or cultural identity, or political party. Reform has to come from within [minority communities], backed by well designed and well executed legislative, administrative and educational measures (Hansard, House of Lords, 26 January 2007).

On the one hand, this indicated support for integrating immigrant communities in providing solutions to these particular forms of gendered violence. On the other hand, the references to the colonial era suggest that British government should relate to its current immigrant communities as it did to its colonial subjects. Many analyses of the campaigns against sati have indicated how practices like these were positioned by colonizers "as symptoms of the 'backwardness and barbarity' of Third-World cultures in contrast to the 'progressiveness of western culture'" (Narayan 1997:17; Meeto and Mirza 2007). The appeal to colonial social relations risks reaffirming such stigmatizing understandings of immigrant communities.

The emphasis on children in reports from the House Affairs Committee (HAC 2008a) and on the high incidence of mental and learning disabilities among those at risk of forced marriage in the debates of the Forced Marriage Act in the Commons (Hansard texts, House of Commons, 17 July 2007) similarly position immigrants as not full subjects. In these documents and debates, children under 17 were considered most likely to be subject to forced marriage. There are proposals to develop educational materials to be distributed in secondary schools in which multiagency bodies aim to raise public awareness (HAC 2008a; Multi-Agency 2009). One of the goals is to give school officials the tools to identify warning signs of children who might be subject to a forced marriage (HAC 2008a; Multi-Agency 2009). This direct focus on children is unique to the British case.

This line of reasoning segued into a rejection of multiculturalism, in favour of a human rights approach to honour-related violence, similar to the arguments made in the newspapers. Lord Lester indicated that his motivation for introducing the Forced Marriage Act came from his concern that British multiculturalism had led to the neglect of the needs of immigrant women and girls. He argued,

It is more than 30 years since I warned that, 'it would be entirely misguided for public authorities to tolerate the exploitation of children or the maltreatment of wives and daughters because such practices were condoned by a particular national, religious or cultural group...cultural tolerance must not be a cloak for oppression and injustice within the immigrant communities

themselves'. Regrettably, the warning was not heeded (Hansard, House of Lords, 26 January 2007).

In making this argument against multiculturalism, Lord Lester asserted that his Bill reflected a "victim-centred human rights approach," thus substituting a universalizing discourse of rights for the recognition of difference often associated with multiculturalism.

This rejection of multiculturalism became a rejection of the neglect for the needs and rights of immigrants that newspaper arguments also associated with multiculturalism. However, rather than stigmatizing immigrants as newspaper discourses did, Lord Lester warned that the Bill did not intend to be "demonising British Asians" because they were necessary participants in the fight against these practices. Like Lord Lester, Baroness Uddin positioned local, community-based immigrant women organizations as vitally important in creating the solution to the problem. This led her to the following critical assessment of the Bill:

I support the Bill in principle, but am concerned that it should not be regarded as a panacea: a convenient but empty tool by which well meaning but practically ill-informed individuals and agencies can feel that a shallow victory has been secured, while women affected by this are kept out of the loop, not receiving the services and provisions they desire and rightly deserve (Hansard, House of Lords, 26 January 2007).

In other words, in the debates that led to the passage of the Forced Marriage Act arguments against multiculturalism and in support of a human rights framework intersected with the idea that without the specific knowledge necessary to respond to the complexities of forced marriage and honour-related violence, the problem would not be addressed. This opened the door to a contextually specific approach to forced marriage, one that would position immigrant women's organizations as full partners (not only consultants) in the development and implementation of national honour-related violence policies. However, the continued exhortations that more knowledge and better partnerships are needed, which echoes through government and police reports, indicates that this has not happened yet (ACPO 2008; HAC 2008a).

The police has publicly been called to task for the effects of the absence of such resources and knowledge among its front-line officers. Its response to Banaz Mahmud's murder had fallen short to the point that the press in part attributed Banaz's death to the police's failure to protect her. Government documents show that police training was initially discussed in 2003, but only introduced in 2005.⁴⁶ This training manual notes that British police officers have the duty to protect victims and make immigrant families, especially men, comply with the rules of the British society. However, a document produced in 2008 (after Banaz's death in 2007) showed that the police had not been living up to this training. Echoing the arguments from the newspapers that multiculturalism and inappropriate cultural sensitivity was at the root of the police's failure to respond, Commander Steven Allen argued:

The police response to this issue has nothing to do with political correctness and nothing to do with inappropriate sensitivities. The police response is about saving life, protecting those at risk of harm and bringing perpetrators to account. We have an absolute duty to uphold the law and to protect the Human Rights of our fellow human beings. I commend this strategy to you (ACPO 2008:4).

This strategy presses police officers to act to protect victims of domestic violence regardless of their cultural background. At the same time, it encourages the police to collaborate with local organizations, both volunteer and professional, to increase its understanding of the complexities involved with the problem.

⁴⁶ See *Dealing with Cases of Forced Marriage: Guidelines for Police Officers*. (Home Office et al. 2005).

Addressing violence against immigrant women

The rejection of multiculturalism in policy approaches to honour-related violence in Britain is part of a larger shift from British multiculturalism to social cohesion in Britain (Dustin and Phillips 2008). In the specific case of Britain, multiculturalism has been influential in the “enclavization” of immigrant communities by essentializing and homogenizing communities and their “cultures” through state-affirmed rules and regulations (Vertovec 1996). Social cohesion policies have increasingly become the remedy to the effect of this apparent paradox between group rights and individual rights.⁴⁷ As Labour Party Home Office Minister Mike O’Brien argued “Multicultural sensitivity is no excuse for moral blindness” (cited by Lily Gupta in *Guardian*, 9 January 2008), in a statement that reflects the prevalence of social cohesion discourses in Britain. However, as other scholars have pointed out, it is unlikely that social cohesion policies will provide the best solutions for combating violence against women.

The main problem with social cohesion policies is that they downplay differences among those living in Britain, leading to such recommendations as those by the British Commission on Integration and Cohesion that translation services be cut back in order to ensure that all immigrants can read in English. Rahila Gupta rightfully stated that “If leaflets on honour crimes were only available in English, then learning English would become, literally, a matter of life and death” (Gupta, *Guardian*, 12 June 2007). Gupta also discussed the proposal by Ruth Kelly, the Communities’ Secretary, to halt state funding to immigrant organizations that deal with a single ethnic group. For Gupta, such social cohesion policies foster their own forms of neglect by offering a “magical” remedy to the pitfalls of multiculturalism.

Current approaches to honour-related violence reflect that policy makers have to some degree adopted the “mature multiculturalism” framework advocated by SBS, which is marked simultaneously by an appreciation of contextual specificity and an insistence that members of immigrant communities share the rights of all citizens and residents in Britain. Most recent policy developments indicate that this need for contextually specific knowledge and linkages with immigrant communities is to some degree becoming part of the conceptualizations of best approaches to address honour-related violence.

Despite these calls for closer collaborations with community groups, most of the policy emphasis to date has been on supporting established institutions such as the police and the Forced Marriage Unit. Similarly, the Forced Marriage Act in effect institutes standard forms of redress to domestic violence such as a court-ordered protection of (potential) victims. Such protections can be vitally important but the Act is, even in the words of its initiator Lord Lester, at best a “springboard for effective educational and administrative measures and for leadership and public education within, as well as outside, minority communities” (Hansard, House of Lords, 26 January 2007). While these laws and policies clearly can have a place in a comprehensive approach to honour-related violence, they also do the least of all possible policy avenues to treat immigrants as full *participating* members of society. A large number of immigrant women’s groups continue to be cited as providing consultations to the Home Affairs Committee, the House of Lords and police task forces, but our analysis suggests that they far more rarely become full partners in developing and implementing policies to combat honour-related violence as a contextually specific form of domestic violence.

The continued treatment of immigrants as not truly full members of British society is also reflected in the Third Party Intervention aspect of the Forced Marriage Act, which allows third parties, including police officers, to intervene on behalf of the suspected victim, even without immediate consent of the suspected victim (Ministry of Justice, Forced Marriage [Civil Protection] Act 2007–Relevant Third Party, CP(R) 31/07, 13 November 2008). This provision has raised concerns about possible violations of civil liberties of immigrants travelling to their country of origin, increasing racial profiling at the borders and further stigmatizing immigrant communities.

⁴⁷ See also Okin 1999; Shachar 2001; Phillips 2007.

The British media have tried to act as an agenda setter in these discussions of multiculturalism versus social cohesion. They have placed immigrant women's rights in the centre of the debate, and both those arguing for an emphasis on social cohesion and mature multiculturalism claim that they provide better policies for the emancipation of women. One of the questions is how these debates will affect the development of a more comprehensive policy approach to honour-related violence. Will the social cohesion agenda hurt women by furthering an anti-immigrant agenda? Will a mature multiculturalism lead to targeted prevention, protection and prosecution without stigmatizing entire groups for the acts of some? These are questions to ask as we continue to watch the development of policy in Britain.

Honour-related violence in Canada

The Canadian case is unlike the other three because of the near absence of any mention of honour-related violence in any political debate, both at the federal level and within provinces like Ontario that have large numbers of immigrants. Canada has seen two murders of daughters by fathers, that of 16-year-old Aqsa Parvez whose family came from Pakistan and that of 17-year old Amandeep Atwal, a Sikh girl of Indian descent, both of which have been labelled honour killings by some.⁴⁸ While Aqsa Parvez's murder led to considerable media debate on the integration of Muslim immigrants and the need to protect immigrant girls from domestic violence, very few parliamentarians spoke on the murder and no policy proposals were made. The framing of Aqsa's murder reflects the stigmatizing discourses seen in the other three cases. In addition, a clear culture-blind construction of this murder dominated media discussions. Finally, Muslim and immigrant women's organizations that spoke out publicly on the issue argued against using the term honour-killing in order to avoid stigmatization of Muslim communities in Canada. In the other three countries, NGO framing of honour-related violence as a social problem that involved a particular form of gendered violence impacted policy development. In Canada, such NGO influence was absent.

Framing the problem: Islam, culture clash and generational difference

Canada has no formal policy approach to honour-related violence and there are no special programmes targeting this form of violence at the national, provincial or municipal level. An exhaustive search of government and NGO websites netted only a mention of a training offered to Victoria police by a British team on honour-related violence and a mention in a speech on the occasion of international women's day by Senator Mobina Jaffar. There is as yet, no policy targeted at honour-related violence or forced marriage at either the provincial or federal level.

One could draw the conclusion that such violence is not an issue in Canada, but instead it seems that Canadian policy makers operate within a context that did not frame forms of violence that elsewhere were seen as honour-related in that way. An analysis of the reporting of the murder of Aqsa Parvez by her father allegedly because she refused to wear the *hijab* indicates why policy development in Canada might be lagging.

Aqsa's murder was not labelled an honour killing or violence informed by notions of honour. This despite the fact that many of the murder's attributes are very similar to the European cases. For example, a school counsellor was quoted as saying:

'These kids are totally caught in the middle. I've had students come to us who have been physically and verbally abused...yet they tell us it's culturally acceptable for parents to beat them,' said Stulberg. 'Girls tell us their brothers follow them in the halls to make sure they're not talking to boys,' she said, adding families have sent girls and boys who misbehave 'back home to be

⁴⁸ While we were writing this paper, a father, mother, and brother were accused of planning and executing the drowning death of three sisters and their aunt on 30 June 2009. The news reporting labelled these murders honour killings. In addition, for the first time in Canadian history, in May 2009, the Crown successfully used honour killing as the grounds for convicting a man of the murder of his sister and her fiancé.

married'. On the other hand, the veteran counsellor says she feels badly for immigrant parents who see typical teenaged behaviour as blasphemy. "They gave up everything to bring their families here for all the opportunities Western culture can offer, but socially, they expect their children to act as if they're at home." Stulberg says teachers report cases of suspected abuse to police, but also try to serve as go-betweens with students and their parents, along with two settlement workers (Brown and Girard, *Toronto Star*, 12 December 2007:A7).

This article and a number of others flagged issues that in the other three countries would be labelled forced marriage—for example, sending children "back home to be married"—or as red flags for honour-related violence—for example, "girls telling us their brothers follow them in the halls to make sure they're not talking to boys." The question then is not whether there is forced marriage or honour-related violence but why it has been rarely labelled as such and why there are no government policies directed at the problem.

The answer lies in the response to the stigmatization so clearly present in these descriptions of Aqsa's murder as the most extreme outcome of a culture clash between first-generation immigrants and their second-generation children. Immediately after the December 2007 killing of 16-year old Aqsa Parvez, newspaper articles discussed how Aqsa's murder reflected the problems of the second generation of immigrants who attempt to emancipate themselves from their parents' traditions. Her friends told journalists about the conflict Aqsa and her father had regarding her refusal to wear the *hijab*: "The family infighting over her dress had become so intense that Ms. Parvez temporarily moved out of their two-storey Mississauga home in September, friends said" (White and Mick, *Globe and Mail*, 12 December 2007:L1). These descriptions led to the following juxtaposition of Western culture and Islam:

Ms. Parvez's friends described the Grade 11 student at Applewood Heights Secondary School as someone who was drawn to Western culture even as her family adhered to a devout form of Islam. Friends paint a picture of a hardworking and cheerful girl who loved dancing, fashion and photography—interests that often clashed with her strict home environment (El Akkad and Wallace, *Globe and Mail*, 12 December 2007:A1).

In other words, Aqsa's participation in Western culture made her feel liberated and happy, something her father and brother(s) could not abide. This homogenizes Islam and creates grounds for the same kinds of stigmatizations seen in the other country cases.

Rather than navigating such stigmatization in ways that allowed for an approach in which honour-related violence was recognized as a specific form of violence, discourses became culture-blind, centring on a (universal) clash between patriarchy and women's rights. For example, *Globe and Mail* columnist Margaret Wenté, who often writes about the purported misogyny and lack of liberalism of Islam, argued:

There's no sign that Aqsa's death was an honour killing, deliberately plotted and coldly carried out to preserve the family name. More likely, if the version we have heard so far is correct, it was an accident, the product of rage, frustration and an urge to punish that got out of hand. It's a common enough story. A man who feels powerless and impotent strikes out at the woman whose behaviour and sexuality he fears he can no longer control. Her moment of greatest danger is when she tries to leave (Margaret Wenté, *Globe and Mail*, 13 December 2007).

In this rendering, Aqsa's murder was the result of a clash between one individual father and his daughter, which produced male rage and enabled the ultimate expressions of men's power, the power to kill. While not a particularly subtle analysis, Wenté tied this rage only weakly to Islam, arguing that Muslim groups in Canada had been "quick to condemn Aqsa's killing" (Wenté 2007). In the end, then, even Wenté, who usually does not shy away from targeting

Muslims as “other” in her writing, adopted a normalizing, even Westernizing discourse, in discussing the crime, a gendered discourse of uncontrollable male violence and female victimhood. She (and many others) ultimately depicted Aqsa’s father, Muhammad Parvez, as a child abuser, perhaps stressed by migration and culture clashes, but not as someone who was engaged in a deliberately planned attempt to cleanse his family’s honour. Thus, this was a construction of a culture clash but without the stigmatizing homogenization of immigrants associated with it. Rather, this approach to the problem reflected the culture blindness of a singular focus on gender rather than the intersectional approach that enables one to see the multifaceted nature of honour-related violence.

At the same time, the suspicion that this might be an honour killing kept coming up. When in July 2008, the charge against Muhammad Parvez was upgraded to first degree (or premeditated) murder and her brother Waqas’ charge was changed from obstruction of justice to premeditated murder as well, the debate on whether this was an honour killing reignited. A *Toronto Life* magazine article in December 2008 labelled the murder an honour killing, and, in an echo of the British discussion, blaming Canadian multiculturalism for the silence surrounding it.⁴⁹ This led to a short but intense media debate on the author’s inappropriate use of the label honour killing, and even more, her flawed understanding of multiculturalism. Ultimately, the notion that this was an honour killing was consistently present in the background of the reporting on Aqsa Parvez’s murder but there has not yet been consensus to label it thus.

Lagging policy making in Canada

One effect of the reticence to label murders like Aqsa Parvez’s honour killing was that unlike in the other three country cases, the media did not instigate a policy debate. This meant that policy makers could ignore the question of whether they needed to do anything about honour-related violence. What we did find was “culturally specific programming” by street-level organizations working against violence against women (for example, HEAL Peel Region), which takes the place of programming that targets honour-related violence in the European context. At the same time, in the three European countries, immigrant organizations and immigrant women’s groups were often key in initiating media and policy debates on honour-related violence. In Canada, these groups tended to reject the idea that honour-related violence or honour killing were useful labels for these forms of violence. For example, Alia Hogben of the Canadian Council for Muslim Women argued that there is no such thing as honour killing and that honour was too often used as a justification for violence (phone interview, 5 August 2009). She said that the violence to which Aqsa was subjected was a case of child abuse taken to the extreme.

Without powerful media actors instigating debate, without NGOs and politicians willing to use the media to set the policy agenda, as happened in the European cases, honour-related violence is unlikely to become a policy issue in Canada. On the one hand, a refusal to use the label honour killing or honour-related violence means that the intense stigmatization of entire immigrant communities that attends this labelling in many European countries does not necessarily take hold in Canada (Razack 2009). On the other hand, this becomes problematic if it means that victims of such forms of violence do not receive the help they need as a result of culture-blind policy making. Further research should show whether the resistance to labelling this form of violence in terms that render it non-Western has a negative impact on the victims of this form of abuse. In addition, there are indications that immigrant groups might be shifting strategies. For example, the South Asian Legal Clinic of Ontario organized an international conference on forced marriage in June 2008. The presence of British speakers suggests that the British approaches might be introduced into the Canadian context.⁵⁰ Tracking these developments will show whether in Canada, too, NGOs can be catalysts for policy formation.

⁴⁹ Mary Rogan, “Girl, Interrupted”. *Toronto Life Magazine*, December 2008, www.torontolife.com/features/girl-interrupted/, accessed on 1 October 2010.

⁵⁰ SALCO 2008 annual meeting report. www.salco.on.ca/SALCO%202008%20AGM.pdf, accessed on 17 January 2010.

Conclusion

This paper examined which understandings of honour-related violence dominated media and policy making debates in four immigrant-receiving countries that have grappled with honour killing and forced marriage. The analysis focused on how, in this context, media and NGOs framings of honour-related violence influenced parliamentary debates and policy-making processes. These debates took place in a context of racialization, in which these immigrants have increasingly been constituted as different along the intersecting dimensions of gender, religion and culture.⁵¹ The research showed that in all these countries, Muslim immigrants were often the primary focus of media and policy debate even though these countries have very diverse migrant streams, including non-Muslim immigrants who commit honour-related violence.

In the analysis of the newspaper reporting, parliamentary debates, NGO and police documents, and interviews with key stakeholders in the debate, we identified three trends in how the problem of honour-related violence was framed: stigmatization, culture blindness and contextual specificity. Stigmatization took the form of seeing honour killing, forced marriage and other forms of honour-related violence as indicative of the flawed religious and cultural practices and beliefs of all immigrants from Turkey, the Middle East, North Africa and South Asia. In each country, the issue of how to understand this form of violence contained a variant of seeing it as a Muslim immigrant-related practice that could be understood as the outcome of unequal gender relations that stood in opposition to the social and political norms of Western states (see also Goldberg 2002; Joppke 2009). The debates then focused on whether the religion of Islam or a patriarchal immigrant culture shaped these gender relations. Such stigmatizing discourses often informed assimilationist integration policies and policies to restrict immigration.

While there were stigmatizing discourses in all four countries, they did not influence policy making to the same degree in each case. Whether stigmatization dominated seemed to depend on the presence of discourses that promoted an understanding of honour-related violence as contextually specific or informed by the specificities of the migration experience, the context of reception in the receiving country, and the varied ways in which gender relations, culture and religion intersected in immigrants' lives. In the Netherlands, a contextually specific approach had the most influence in policy making among the four countries. In Germany, some contextually specific discourses existed in both media and parliament but they did not inform policy making. In Britain, the media and parliamentary debate stigmatized immigrant communities to varying degrees. At the same time, a rejection of British multiculturalism informed calls for a more incisive response to the incidence of honour-related violence based on recognizing this as a contextually specific form of violence. In Canada, stigmatization combined with the last discursive trend, culture blindness, in which violence that elsewhere might have been labelled honour-related was seen as general violence against women. The absence of contextually specific understandings of the problem led to an absence of policy making against honour-related violence.

The issue of belonging is at the heart of much of the media debates and policy approaches to honour-related violence (whether it is labelled thus or not). This paper has shown that if honour-related violence is treated as a "foreign" import, the solution to this form of violence is more likely to entail immigration controls and assimilationist integration policies. Conversely, if the communities in which this form of violence takes place are seen as integral parts of society, then politicians, media producers, and NGO members are more likely to approach honour-related violence as a form of domestic or gendered violence. As the Dutch case shows most clearly, by taking the context within which this violence is produced seriously, policy makers were able to develop comprehensive programming aimed at prevention, protection and prosecution.

⁵¹ See also Razack 2004, 2007; Wilson 2007; Dustin and Phillips 2008; Korteweg and Yurdakul 2009.

These conceptualizations of honour-related violence and the policies that flowed from them were shaped in engagement between politicians and other state actors, and the media and various NGOs. While the findings cannot systematically show how each domain influenced the policy making processes, they do suggest some trends.

With respect to NGO involvement, in the Netherlands, immigrant umbrella organizations initiated discussions with Dutch policy makers and were closely incorporated into the subsequent policy decision-making processes. These organizations were also expected to downstream the decisions to the local and neighbourhood level, and follow up on the implementation of the policies. The fact that NGOs could build on the institutionalized consultative process with the Dutch government facilitated these efforts. In addition, NGOs were largely united in their policy goals.

By contrast, in Germany, NGOs had less influence on the policy-making process. Major women's organizations, such as Terre des Femmes, were initiators of the honour killing debates in Germany, and they had informal but close ties to some parliament members. However there was no systematic relationship between NGOs (especially organizations working with immigrants or immigrant communities) and policy makers in Germany. As a result, immigrant groups mostly became targets of policy, but not policy makers or implementers.

In Britain, immigrant women's groups were major consultative partners in the development of policies. They also played an advocacy role in their engagement with the media. In addition, a number of these groups ran programmes at the municipal level, aided by government funding. Finally, they provided key advice in developing police training materials. Extensive consultation processes showed the inclusion of immigrants (probably a legacy of multiculturalism in Britain). However, the contrast between the Dutch and British case indicates that British NGOs were not as systematically integrated into all aspects of policy making and implementation. In addition, NGOs did not always present a united front when it came to addressing honour-related violence and forced marriage, which further complicated their policy involvement.

In the Canadian context, immigrant women's organizations primarily resisted labelling honour-related violence as such. This most likely informed the absence of policy making in Canada.

The media were an important arena for the development of a problem definition that informs policy making, playing either a watchdog or an agenda setting role, while providing a forum for various advocates, NGO spokespersons and politicians and other state actors.⁵² Yet, the media's role was not the same in each case. In the Netherlands, the media brought the issue to public awareness in the period preceding mid-2005, but once politicians had committed to creating the Program Against Honour-Related Violence by the end of that year, the Dutch media became mostly a watchdog for the implementation of policy decisions. In Germany, the media strongly influenced political debates as an agenda setter in a context where policy development was unfolding. Although the newspapers we analyzed were not very critical about the policies politicians proposed or implemented, they created an impetus for taking up the issue in the policy-making arena. They also offered a forum for politicians and NGOs to articulate their conceptualization of the problem, and these problem definitions seemed to shape parliamentary debates as well. The British media acted both as watchdog and agenda setter. The media criticized failures to implement existing policy, such as the failure of the police to protect Banaz Mahmud, while creating a platform for activists and politicians' to explore ideas about how to improve policy responses to honour-related violence. The Canadian media did not push for policy development and largely interpreted violence that elsewhere might have been classified as honour related as intergenerational tension, in effect actively *not* setting the policy agenda.

⁵² Birkland 1998, 2004; Dery 2000; Kingdon 2003; Norris and Odugbemi 2008.

The paper's findings suggest that gendered violence, violence against women, and in particular honour-related violence, in immigrant communities will remain an issue in the media and policy-making debates in immigrant-receiving countries. The United Nations have been involved in these debates and its reports assert the immediate need for the improvement of data and research on the topic, in order to assist in the provision of better services to the victims and to enable political and institutional environments to introduce legal changes and empower women. Here, the findings are in line with the recommendations of the Commission on the Status of Women, which has advocated for a framework that emphasizes the empowerment of women rather than a victimization approach.⁵³ On 26 June 2009, the Parliamentary Assembly of the Council of Europe adopted Resolution 1681, emphasizing the urgent need to combat so-called honour crimes in Europe and asking for concrete measures, such as national action plans, protection and support of victims, awareness-raising campaigns and passing appropriate legislations for prosecution. As the findings suggest as well, these measures must empower immigrant women in their countries of residence, rather than instrumentalizing women's rights and gender equality in ways that stigmatize immigrant communities and restrict immigration.

⁵³ United Nations 2002; Ertürk 2007, 2009.

Appendix 1: Immigrant Communities in the Netherlands, Germany, Britain and Canada

All four countries under study grapple with large increases in ethnic, racial, religious and gender diversities resulting from immigration, and have developed immigration and integration policies in response to these diversities. However, each country has followed different trajectories in the struggle over the relative importance of liberal democratic values, multiculturalism and assertions of ethno-national identity in integration policy development and policies focused on honour-related violence.⁵⁴

Since the 1960s, the majority of immigrants in the Netherlands arrived from four non-Western countries: the former colony of Surinam, the Dutch protectorate of the Antilles, and guestworker-sending states Turkey and Morocco. These immigrants and their descendants now make up 10 per cent of the Dutch population (Gijsberts 2005). In public debate, immigrants from Muslim countries like Turkey and Morocco, who comprise 4.5 per cent of the Dutch population, are currently most strongly associated with the immigrant label (Forum 2008). A sense that Muslim immigrants are profoundly different from majority society has given rise to discourses and integration policies that reflect assimilationist assertions of individual liberal democratic values.⁵⁵

Germany's immigrants consist largely of former guestworkers, mainly from Turkey and other Southeastern European countries. These immigrants constitute approximately 4.1 per cent of Germany's population (Forum 2008). In Germany, national identity was historically tied to an ethnic understanding of nationhood, but the 1990s saw a shift toward the importance of shared civic values, particularly in the expansion of citizenship laws.⁵⁶ In 2000, major changes to German citizenship law and immigration regulations moved the country toward extending full citizenship rights to immigrants, with a focus on integration of already existing immigrant populations. In 2005, integration policies that require new immigrants to take language and culture courses took effect. At the same time, German parliament has been debating how to increase the proportion of high-skilled immigrants among the newcomers. Although German immigration policies have become quite restrictive, specifically toward Turkish and other Muslim immigrants, currently Germany has a more ambivalent approach to assimilation than the Netherlands (Korteweg and Yurdakul 2009).

Britain's migration patterns and policies have been shaped by Commonwealth migration (Hansen 2000). Until 1962, Britain's borders were open to migrants from the Commonwealth countries. Between 1962 and 1981, Britain had different immigration and citizenship policies for British subjects, Commonwealth citizens and the citizens from other countries. In 1981, the British Nationality Act rescinded the multilayered citizenship of 1962, and created a British citizenship for those residing in the United Kingdom, excluding the Commonwealth countries and the colonies from this citizenship. The current British Nationality Act is a combination of *jus soli* and *jus sanguinis*, granting citizenship rights after a relatively short residence in the United Kingdom. However, immigration policy is perhaps one of the most restrictive in Western Europe, only allowing for family reunification and employment, in effect reinforcing a distinction between "British" and "other".⁵⁷

The majority of immigrants to Britain come from South Asia, the Caribbean and Africa, with approximately 1.5 million Muslims, or 2.7 per cent of the total population (2001 Census). Ethnic and racial diversity has long led to serious tensions, while Islam has become a distinct concern after 11 September and the 11 July London subway bombings. Policy responses to these

⁵⁴ Korteweg and Triadafilopoulos 2009; Korteweg and Yurdakul 2009.

⁵⁵ Scheffer 2000, 2007; Entzinger 2003, 2006; Prins 2004; Duyvendak 2006; Bjornson 2007; Duyvendak et al. 2008; but see Koopmans 2002, 2009.

⁵⁶ Brubaker 1992; Ignatieff 1993; Klusmeyer 2001; Kastoryano 2002; Klopp 2002; Hansen and Koehler 2005; Koopmans et al. 2005; Mandel 2008.

⁵⁷ Hansen 2000; Yuval-Davis et al. 2005; Gibney 2008; see also Crowley and Hickman 2008; Pilkington 2008.

tensions have shifted over the years from multiculturalism towards an emphasis on social cohesion. Social cohesion policies mainly promote an assimilatory form of integration into British society, targeting Muslim immigrants and their neighbourhoods (Schönwälder 2007; Wohlrab-Sahr and Tezcan 2007). Social cohesion discourses and policies are criticized by immigrant groups, political activists and scholars who argue that integration should not mean “cultural conformity and exclusive loyalty to Britain” (Nagel and Staeheli 2008:415).

Canada underwent rapid diversification of its population after immigration policy changes in 1967 opened the country to immigrants from the global South. Despite continuing to be an immigrant destination, Canadian Muslims, approximately 2 per cent of the total population, are a relatively smaller presence than in the other three countries. Yet in the Canadian debate, Muslims receive significant attention, particularly in Quebec (see for example, the Bouchard-Taylor report) but also in other provinces.⁵⁸ However, public debate also focuses on immigrants whose foreign professional credentials are not recognized or on Sikhs’ religious practices. Outside Quebec, Canada’s policy of official multiculturalism seems to continue to mute the strong assimilationist discourses that have come to guide integration policy debates in European countries, though in Canada too integration discourses have assimilationist undercurrents (Kymlicka 2007; Li 2003).⁵⁹

⁵⁸ Li 2003; Razack 2007; Korteweg 2008.

⁵⁹ Recent changes to the Canadian citizenship law seem influenced by more European concerns with social cohesion and the maintenance of a distinctly “Canadian” culture (see Triadafilopoulos and Marwah 2009).

Appendix 2: Data Sources

The Netherlands

Interviews

Name of the organization	Type of organization	Name of the interviewee	Date and place of the interview
MOVISIE Knowledge Center on Social Development www.movisie.nl www.huiselijkgeweld.nl www.watiseer.nl	Majority organization that focuses on support for vulnerably groups in society, including gender issues	Hilde Bakker, Senior Consultant Domestic and Honour-Related Violence	10 June 2009 MOVISIE offices
LEC National Center for Expertise on Honour-related Violence	Police	Willem Timmer, head Janine Jansen, researcher	9 June 2009 LEC
Federatie Opvang www.opvang.nl	Umbrella organization for shelters	Johan Gortworst, director	10 June 2009
Stichting Kezban www.st-kezban.nl	Non-profit organization fighting domestic and honour-related violence by and for immigrant women	Sita van Groesen Board member	12 June 2009 Home
Vluchtelingen Organisaties Nederland (VON) www.vluchtelingenorganisaties.nl; www.stopgeweldtegenvrouwen.nl	Umbrella for refugee organizations in the Netherlands (human rights, immigrant rights organization)	Anne-Floor Dekker, Coordinator honour-related violence program	12 June 2009 VON offices
Samenwerkingsverband Marokaanse Nederlanders (SMN) www.smnnet.nl	Umbrella organization for organizations of immigrants of Moroccan descent in the Netherlands	Karima Ouchan, Program coordinator, "on the (b)right side of honour"	10 June 2009 SMN offices
Inspraak Orgaan Turken in Nederland (IOT) www.iot.nl	Umbrella organization for organizations of Turkish immigrants in the Netherlands	Carola Dogan, Coordinator, honour-related violence programme	9 June 2009 IOT offices
Independent documentary film maker journalist Founder Stichting Kezban	n.a.	Saadet Metin	15 June 2009 Home
Freelance journalist Author of <i>Eerwraak in Nederland</i>	n.a.	Renate van der Zee	8 June 2009

Newspapers

Collected all articles that referenced the murder of Zeynep Boral.

De Volkskrant – three articles

NRC Handelsblad – seven articles

We supplemented this with newspaper data gathered for an article analyzing media debates of honour-related violence in the Netherlands (Korteweg and Yurdakul 2009).

Newspapers cited

Editors, 2005. "Eerwraak net zo vaak bij mannen," *NRC Handelsblad*, 2 February, p. 3.

Groen, Janny, 2004. "Onderduikadres vrouw moet weer geheim worden," 17 March.

du Pré, Raoul, 2005, "Eerwraak bestrijden als een terroristische daad, Interview," *De Volkskrant*, 4 February, p. 2.

Parliamentary debates

Tweede Kamer: www.overheid.nl

Search for: *eerwraak* (honour revenge, the Dutch term for honour killing), Zeynep Boral, *eergerelateerd geweld* (honour-related violence).

Germany

Interviews

Name of the organization	Type of organization	Name of the interviewee	Date and place of the interview
Terre des Femmes	Majority organization that focuses on women's issues	Rahel Volz	10 October 2008 Phone interview from Tübingen, head office for Terre des Femmes
		Sybille Schreiber	20 January 2009 Terre des Femmes, Berlin
		Regina Kalthegener	20 November 2008 Legal office, Berlin, follow-up 25 February 2009
Papatya e.V.	Immigrant organization that focuses on women's issues	Corinna Ter-Nedden	16 January 2009 Humboldt University, Berlin
Türkische Gemeinde in Deutschland	General immigrant organization (secular)	Kenan Kolat (conversation)	19 February 2009 public location, Berlin
		Safer Çınar	8 October 2008 Office for the Türkische Bund

Newspapers

Collected all articles that referenced the murder of Hatun Sürücü.

Berlin Tageszeitung (TAZ) – 149 articles

Süddeutsche Zeitung (SD) – 26 articles

Newspapers cited

am Orde, Sabine. 2005. Safer Çınar cited in an interview "Sprechen Sie mit den Jungs!" *taz*, 22 February, www.taz.de, accessed in October 2010

Bullion, Constanze. 2006. "'Ehrenmord' In den Fängen einer türkischen Familie." *Süddeutsche Zeitung Panorama*, 12 April, p. 10.

Kelek, Necla. Interview by Jan Feddersen and Martin Reichert. 2005. "Es sind verlorene Söhne ..." *taz*, 23 September 2005, www.taz.de/1/archiv/archiv/?dig=2005/09/23/a0106, accessed in October 2010.

Ramelsberg, Anette. 2005 "'Ehrenmord' in Berlin Vogelfreie Frauen." *Süddeutsche Zeitung Politik*, 21 February, pp. 5–9.
 Simons, Mark. 2005. "Tatmotiv Kultur" *Frankfurter Allgemeine Zeitung*, March 3.
www.faz.net/s/Rub117C535CDF414415BB243B181B8B60AE/Doc~EE93B2526AA584AC1B1001479ED79D507~ATpl~Eco_mmon~Scontent.html, accessed in October 2010.

Parliamentary debates

Bundestag (federal): www.bundestag.de/bundestag/index.jsp

Baden-Württemberg (province): www.landtag-bw.de/dokumente/

Berlin (province): www.parlament-berlin.de:8080/starweb/AHAB/

Searched for: *Ehre* (honour), *Zwangsheirat* (forced marriage), *Ehrenmord* (honour killing),
 Hatun Sürücü

Britain

Interviews

Name of the organization	Form of organization	Name of the interviewee	Date and place of the interview
Newham Asian Women's Project, director Imkaan (a second-tier national VAW charity) (member) Liberty's Project Advisory Group (member) End Violence Against Women' group (EVAW) (member)	Immigrant organizations that focuses on women's issues	Dr. Aisha Gill	30 March 2009 Roehampton University
Southall Black Sisters	Immigrant organization that focuses on women's issues	Hannana Siddiqui	19 February 2009 SBS offices
Muslim Council of Britain	Muslim advocacy organization	Dr. Reefat Drabu	9 April 2009 Offices in Eastleigh

Newspapers

Collected all articles that referenced the murder of Banaz Mahmod

Guardian — 28 articles

Daily Telegraph — 14 articles

Newspapers cited

Blakely, Rhys. 2008. "'Forced marriage' doctor, Humayra Abedin, freed by Bangladesh court." *Times*, 15 December. www.timesonline.co.uk/tol/news/uk/crime/article5340058.ece, accessed in October 2010.

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www.telegraph.co.uk/news/newstoppers/politics/1577395/Multiple-wives-will-mean-multiple-benefits.html,
accessed in October 2010.

Parliamentary debates

www.parliament.uk

House of Commons

House of Lords

Searched for: honour-based violence, honour killing, forced marriage, Banaz Mahmud.

Canada

Interviews

Name of the organization	Form of organization	Name of the Interviewee	Date and Place of the interview
South Asian Legal Clinic of Ontario (SALCO)	Immigrant organization focusing on direct services and advocacy	Ritu Chokshi, coordinator forced marriage project	26 June 2009 SALCO offices, Toronto
Canadian Council of Muslim Women	Advocacy organization for Canadian Muslim women	Alia Hogben, Executive Director	17 August 2009, phone interview

Newspapers

Collected all articles that referenced the murder of Aqsa Parvez.

Toronto Star – 29 articles

Globe and Mail – 19 articles

Newspapers cited

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- Wente, Margaret, 2007. "A teenage Muslim girl: Why was she killed?" *Globe and Mail*, 13 December, p. A25.
- White, Patrick, and Hayley Mick. 2007. "Teen death highlights cultural tensions." *Globe and Mail*, 12 December, L1.

Parliamentary debates

Ontario Provincial Government: www.ontla.on.ca/web/home.do

Federal government:

www2.parl.gc.ca/housechamberbusiness/ChamberSittings.aspx?View=H&Language=E&Parl=&Ses=

Searched for: honour violence, honour killing, forced marriage, and Aqsa Parvez.

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